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4 SELECT COMMITTEE TO INVESTIGATE THE  
5 JANUARY 6TH ATTACK ON THE U.S. CAPITOL,  
6 U.S. HOUSE OF REPRESENTATIVES,  
7 WASHINGTON, D.C.

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11 CONTINUED DEPOSITION OF: KELLYE SORELLE

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15 Tuesday, April 19, 2022

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17 Washington, D.C.

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20 The deposition in the above matter was held via Webex, commencing at 10:04

21 a.m.

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2     Appearances:

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5     For the SELECT COMMITTEE TO INVESTIGATE

6     THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:

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8     [REDACTED] INVESTIGATIVE COUNSEL

9     [REDACTED], PROFESSIONAL STAFF MEMBER

10    [REDACTED] INVESTIGATIVE COUNSEL

11    [REDACTED] CHIEF CLERK

12    [REDACTED], INVESTIGATIVE COUNSEL

13    [REDACTED] INVESTIGATIVE COUNSEL

14    [REDACTED], SENIOR INVESTIGATIVE COUNSEL

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2 [REDACTED] We will go back on the record at 10:04 a.m. eastern time. Okay.

3 Good morning. We are reconvening the deposition of Kellye SoRelle that was  
4 continued from, let's see, April 13th.

5 In the room today we have [REDACTED], investigative counsel, [REDACTED]  
6 [REDACTED] investigative counsel, and [REDACTED], also investigative counsel.

7 And I'm going to turn it over to [REDACTED] now to -- oh, and, Ms. SoRelle, I just  
8 want to remind you that you are still under oath and then have to tell the truth for every  
9 question that we ask.

10 So, [REDACTED], I'm going to turn it over to you now.

11

BY [REDACTED]

12 Q Good morning, Ms. SoRelle.

13 How are you doing?

14 A Good morning.

15 Q We met briefly at the first part of your deposition.

16 But I had a few questions for you about the night of January 5th. So I kind of  
17 want to take you back to the timeframe around that garage meeting at the Phoenix Park  
18 Hotel. And we don't have any more questions for but that -- the garage meeting.

19 But I did want to ask you about the meeting with a couple of other individuals that  
20 I think was livestreamed on Facebook. This is the meeting with Ms. Amanda Chase,  
21 Virginia State senator, Josh Macias. Bianca Gracia was also there. And if you could just  
22 kind of describe for me generally how that gathering came about and what the purpose  
23 of that was, we could start there, generally.

24 A So basically after the -- yeah, it was after the garage incident. We go back  
25 upstairs. We're just kind of all sitting around. There's, like, a lot of people there.

1 There's some pastors there from, like, San Antonio, Texas, area. And then Amanda  
2 Chase shows up. I don't know how long. It wasn't too long after we got back upstairs.  
3 And then, they basically just want to do a livestream. I mean, it --

4 Q Was it -- was it an impromptu meeting, or how did you decide to go to that  
5 room after you were in the garage?

6 A That was where -- that was in Bianca's room.

7 Q Okay.

8 A So that was up in her suite. So that's what I'm saying. Like we leave the  
9 garage. We go back up to Bianca's suite, and that's what I'm saying. I don't know if it  
10 was coordinated or not. But it's kind of weird because it was very sequential, if that  
11 makes sense. Like there wasn't -- it wasn't -- it was just, like, boom, boom, boom,  
12 boom. And that's it.

13 Q So did Bianca -- I assume Bianca invited you up to her suite?

14 A That's where we were getting our press credentials and all of that stuff at  
15 the very beginning. So it was just one of those where that's where, like, everything was.  
16 Like when we got there, that's where we went. And then after that, that's where we  
17 returned to.

18 Q So then was it -- was it your understanding or your impression that  
19 Ms. Gracia had invited that group to speak there? Or who organized that discussion  
20 panel?

21 A It was basically just -- it wasn't really organized, as far as I could tell.

22 I'm sorry. My dog is barking. That's actually my dog.

23 Joe, stop.

24 Basically we just get back up there -- we get back up there and it's -- she shows up  
25 and then it's, like, let's do a livestream. I mean, it -- it wasn't even, like, discussed. It

1       wasn't even -- it was just all kind of like boom, boom, boom.   This is what we're doing.  
2       I didn't know we were on the joyride basically.

3               Q     Okay.

4               A     It was just kind of the way things were.

5               Q     So, in addition to you and Mr. Rhodes, and I believe a couple of the Oath  
6       Keepers, other Oath Keepers, that were escorting that evening, and then the folks that  
7       appeared on the livestream, who else was there?   Was it -- were other groups  
8       represented, or who was there?

9               A     In the actual room was just -- Bianca's group basically was there and then  
10      Josh Macias and a couple of those guys -- hold on.

11              I'm going to have to grab him.   Hold on.

12              Q     Sure.

13              A     Sorry.   I have no earthly idea what he's barking at.

14              Q     That's okay.

15              A     But it was --

16              Q     Go ahead.

17              A     It was just -- it was basically that we get back up there.   It's Bianca's people.  
18      There's a few of, like, Josh's people.   They're all kind of like in the same circle, right?   So  
19      we get up there.   It's still the same people that were there.   Then Amanda Chase's  
20      crew shows up -- I don't -- maybe 10 minutes later, 15 minutes later, because it wasn't  
21      that long.   And then it was literally, like, Bianca and all of them were, like, let's do a  
22      livestream.   And I was, like, okay.

23              I mean, it was -- that's just the way it played out.   I don't know.

24              Q     So other than Bianca and her group, Latinos for Trump, Josh Macias and his  
25      group, Vets for Trump, Oath Keepers, and Ms. Chase and whoever she arrived with, were

1       there any other groups represented there? Like were there Proud Boys there, First  
2       Amendment Praetorians?

3             A     Well, that's kind of an interesting question, because I don't really know who  
4       all's associated with what, right? So at that point, I don't know that all these groups are  
5       commingling, and so, I am assuming it's just Latinos for Trump. But then later I find out  
6       that, like, Bianca and Tarrio are both part of Latinos for Trump. And then, you know, I  
7       mean, there's all this crossover that I didn't know at the time.

8             Q     Okay.

9             A     So at that point it just seemed to me it was Bianca's group out of, like,  
10       Houston, San Antonio area. And there were obviously some Vets for Trump there,  
11       because Josh Macias was there. I think Thad was there and I think technically Thad  
12       crosses over -- see, this goes back, to like, I don't really know where all the crossovers are.

13             And so that's -- at that point I just assumed these were, like, Latinos for Trump.  
14       And then Amanda Chase shows up. And she's obviously from her, you know, Virginia  
15       group or whatever. But it wasn't -- it was just she showed up. I mean, I don't know  
16       why she showed up.

17             Q     So you mentioned -- you mentioned Thad. Do you mean Thad Cisneros?

18             A     Yes.

19             Q     And he was also in that room for that Facebook livestream meeting?

20             A     I don't know if Thad was still in there because there were people that were  
21       going up and down the elevator, down to about the, like, second or third floor, wherever  
22       that little lobby area was that everybody was at. And in that group there's a ton of  
23       people. There were Oath Keepers. There were probably Proud Boys. There were -- I  
24       know Vets for Trump. I mean, I really can't tell you who's on what team and what they  
25       were functioning at, at that point.

1           Q    And actually you took me kind of to my next set of questions I was going to  
2   ask.

3           I think last time we talked you described a separate get-together that was kind of  
4   more of a larger gathering of folks drinking on the night of the 5th and just mingling and  
5   socializing. Is that what you're talking about occurring at the second- or third-floor  
6   lobby?

7           A    Yes. There was just, like, this open area where it had, like, some sofas and  
8   some drink machines and stuff like that. I mean, not -- and people were just kind of all  
9   hanging out in that area, chatting. I mean, it wasn't -- I didn't see any, like, maps out,  
10   you know, people planning anything crazy. It was just a lot of people roaming around.

11          Q    And --

12          A    But that was kind of what I noticed as they went up and down. And so,  
13   like, at different points you would see people come in and then you'd see them leave. I  
14   mean, it was kind of like a revolving door.

15          Q    And is that because -- I just kind of want to understand the Phoenix Park  
16   Hotel as a meeting point and why that was the case. Is that because a lot of different  
17   groups and individuals had rooms reserved there?

18          A    Yes. And so that was kind of my take on it is that you had people all over  
19   that hotel, staying. And so they were all kind of just congregating down on that area to,  
20   like, hang out and stuff.

21          Q    Was there some, like, common factors among the people that were staying  
22   at the Phoenix Park Hotel? Or why did they all -- you know, like, I know Ms. Gracia was  
23   there obviously and has connections to Mr. Tarrio who had a room reserved there. Was  
24   she the one that maybe led folks to stay at the Phoenix Park Hotel, or what was the group  
25   that was staying there?

1           A    As far as I could tell, it was basically the ones that had stayed with Bianca  
2   Gracia.  So it was, like, I know that Marsha, I think, was staying there, too, Marsha  
3   Lessard.  I didn't see Marsha, that I can recall, that night.  I'm trying really hard to  
4   think, but I don't think I did.  But it was just basically that's where everybody was -- from  
5   that platform area, that's where they were all staying.

6           Q    Okay.  Were you familiar with any Members of Congress that were staying  
7   at the Phoenix Park Hotel around that time?

8           A    No, I was not.

9           Q    How about anybody that you knew to work for a Member of Congress or  
10   their campaign?  Did you hear anything like that?

11          A    Hold on 2 seconds.  I'm trying to see.

12          Q    Sure.

13          A    I think they're -- I think they've got trucks next door.  So hold on.

14          Q    Okay.  Sorry.  Go ahead.  Repeat that.

15          Q    I was just asking about individuals associated with any Members for  
16   Congress.  So anybody that worked for a campaign or, like, a PAC for a Member of  
17   Congress?  Did you hear anything like that?

18          A    No, I didn't.

19          Q    How about any mentions of Congressman Jackson, Ronny Jackson?

20          A    No.

21          Q    Do you remember any association between him and the hotel?  Okay.

22               And then, if we could just quickly go over the groups that you can think of that  
23   were there at that social gathering that you mentioned.  So you said Proud Boys, Oath  
24   Keepers.  Did you -- I think you also might have mentioned 1AP, or some First  
25   Amendment Praetorium individuals.  Is that right?



1           A    I don't think they were there at that particular -- I mean, I don't -- I didn't see  
2 any of them like the ones that I would recognize.

3           Q    Okay. And did you -- were you there on the second- or third-floor lobby?  
4 Did you hang out with that group?

5           A    I did, actually. I ended up --

6           Q    Okay.

7           A    -- like, as we were leaving, actually after the livestream and stuff like, that  
8 we went down there. It was actually to get the guys that were with us because they had  
9 gone downstairs to hang out. So we went down. It was Stewart, me, and I don't think  
10 there was any -- I think Josh was with us. And we went down there.

11          Q    It might have been my connection. I just lost you for a second. Just the  
12 portion, you said you went down there to get the guys you were with? Is that -- you  
13 mean the other Oath Keepers?

14          A    Right. So there were the guys that went over there with us. And then  
15 while we were doing the livestream or while we were upstairs, they ended up going  
16 downstairs. It's kind of like what I was trying to describe is it was kind of like people  
17 were in and out. And so, it was just basically we were trying to find everybody, and we  
18 assumed they were down there because that's where everybody seemed to be.

19          Q    And as far as you remember from when you were down there, what -- what  
20 were folks talking about or what was -- were people talking about January 6th the next  
21 day and what they -- what they expected?

22          A    So, ironically, this gets to Josh Macias. He's, like, Hey, come here. I want  
23 to talk to you for a second.

24               And we were, like, Okay.

25               But see, it still didn't say anything about -- he just said, Hey, we're going to go

1 down and rally at the Capitol tomorrow.

2 And I'm, like, Okay. Great.

3 And he's, like, We want our voices to be heard.

4 And I was, like, Okay. That's great. I was, like, that's awesome, like.

5 And he's, like, it's the people's house. We're just going to go down there.

6 He never said anything about breaching any security. He never said anything  
7 about breaking in or any of that stuff. So I don't know that he was -- I don't know what  
8 he meant by that in hindsight. You know what I -- does that makes sense?

9 Q Right. I guess -- yeah, because I was going to ask why would that -- why  
10 would he need to explain that to you or why would that be notable? Because that was,  
11 you know, obviously, everybody was going to be --

12 A Because he kind of pulled us aside to say it. And so that's the only reason  
13 why I'm, like, I don't know really what he was trying to imply by that. I don't know if  
14 that was just something he was just trying to -- I don't know.

15 And, I mean, we were just like, okay, like. The stage is right there on the other  
16 side. Like he knew there was one stage in the field behind -- between the Supreme  
17 Court and the Capitol. So we were just, like, Okay. Well, that's great. That's  
18 awesome. We're going to go rally down there. Fantastic.

19 Q And who did he pull aside to tell that to?

20 A Me and --

21 Q That was you -- you and Mr. Rhodes?

22 A Yes.

23 Q And did Mr. Rhodes have a reaction to that?

24 A I mean, we were just, like, okay, I mean, that's awesome. Like I kind of  
25 thought that's what everybody was doing anyway, you know, because that's where Ali's

1 group was.

2 So it wasn't -- I don't know if he was trying to make sure we were there or I don't  
3 know in hindsight. But it was just kind of weird because he was just -- it was, like, it was,  
4 like, secretive or something. And I'm just, like, well, I mean, Stewart's been organizing  
5 security for that lawn.

6 So it was just kind of, like, Yeah. Okay. That's great. Yeah, we know, like,  
7 great.

8 Q So he seemed like his demeanor was that he was revealing something or was  
9 being secretive but he was sort of stating the obvious, I guess?

10 A Yeah, yeah. So at the time, I'm like, okay. Yeah, that's the plan. Like  
11 everybody go be heard, you know, whatever.

12 Q Okay.

13 A But I'm thinking like First Amendment go be heard, you know. I don't -- he  
14 didn't allude to any of the other stuff. He didn't talk about -- and I don't know if he  
15 knew. I mean, you know, I don't -- I don't know. But I'm just saying it was -- it was kind  
16 of a weird moment because it was right when we were leaving.

17 He was, like, Hey, come here.

18 And I'm, like, Okay, you know.

19 He's, like, Okay. We're going to go down and be heard. It's the people's house  
20 and all that stuff.

21 I'm, like, okay. I mean, like, yeah, there's one -- there's a whole stage supposedly  
22 going to be set up. At that point, I thought there was a stage in the lawn by the  
23 Supreme Court between the Capitol. So I was, like, yeah, that's where everybody's  
24 going to be.

25 Q Did you have an understanding or appreciation for how many people, when

1 Josh says, we are going to go down to the Capitol, did he have a group of people with  
2 him? Like, obviously, I know Mr. Rhodes has the Oath Keepers that are under him and,  
3 to some extent, following his direction. Was Josh similarly directing a defined group of  
4 people?

5 A Veterans for Trump.

6 Q Okay. And did you get an understanding of how many people that was or  
7 how many people he brought that day?

8 A I have no clue.

9 Q Any other specific conversations that you remember from that kind of social  
10 gathering?

11 A Not anything other than just, I mean, like, because we had the call. I think I  
12 told y'all about, before Enrique got there, we were on the call with Robert Caron. And  
13 that was Bianca and Thad and myself and Stewart. I don't know if I told you all that.

14 [REDACTED] I'm not sure if we've heard about that call.

15 [REDACTED] is that ringing a bell for you?

16 [REDACTED] [Nonverbal response.]

17

BY [REDACTED]

18 Q Okay. Yeah, why don't you tell us about that? What was -- what was that  
19 phone call?

20 A So when we first got there to pick up our credentials --

21 Q This is after the garage meeting?

22 A No, it's before actually.

23 Q Before. Okay.

24 A We get to the Phoenix. We finally get up and get -- we actually have an  
25 issue getting into the hotel because of their policy. And so we basically kind of wait

1 around until they come and get us. We go up to that meeting area first, and then we go  
2 all the way up. As soon as we get up there, we're there. Say hi to everybody. And  
3 then Bianca's says let's call R.C., which is Robert Caron, and we call him.

4 And really on that, it was really just Robert was checking up to see if, you know -- I  
5 really don't even know, other than he was talking about glad you met Bianca. And it  
6 really didn't go anywhere, other than just, like, kind of what's going on with the legal stuff  
7 and that kind of stuff.

8 I mean, it wasn't anything super spectacular. It was just calling Robert, which I  
9 don't know, because then later Thad kind of alludes to knowing Robert after the 6th. So  
10 I don't know if that was all circular and it was just like a triggering point or something for  
11 the next rollout. I don't know but --

12 Q And who was -- so who was on this phone call? It's you, Mr. Rhodes, Thad  
13 Cisneros, Bianca Gracia, and Robert?

14 A Robert Caron. And I think there was one more guy there but I don't  
15 remember his name, but he was with Latinos for Trump.

16 Q And was Thad Cisneros physically there with you on the call? Like you all  
17 were on one phone?

18 A Yes.

19 Q Okay. Okay. So that's the phone conversation before the meeting.

20 And then -- and then any other conversations you remember from the social  
21 gathering, or how about any conversations with any other Proud Boys? Do you  
22 remember meeting any particular Proud Boys?

23 A Not that I'm aware of at that point.

24 Q Okay.

25 A I --

1 Q Other than -- oh, go ahead.

2 A I was just going to say I can assume basically, because I know that Enrique  
3 was there and, after I realized they're kind of commingled, I can assume there were Proud  
4 Boys there, but I couldn't really like -- because Thad technically is a Proud Boy, right? So  
5 I just was assuming at that point, that there probably are later on. Like at that point I  
6 was thinking they were Latinos for Trump. Later I figure out they're kind of commingled.  
7 So I can assume there's crossover there.

8 Q Can you remind me when the first time you met Thad Cisneros was?

9 A That day.

10 Q That day. Okay.

11 And how was he introduced to you?

12 A This is Thad and he's with Bianca, like, the same way you would introduce  
13 anybody. He didn't say, like, Oh, I'm a Proud Boy or whatever. It's just, like, this is  
14 Thad and this is, you know, so and so and we went around the room.

15 Q Okay. So the original connection, you understood, was between Thad and  
16 Bianca through Latinos for Trump?

17 A Yes.

18 Q Okay. Anything else of note about that social gathering that we haven't  
19 talked about?

20 A Not -- not that I'm aware of or not that I can tell.

21 Q Okay. After that, where did you all go? Or what did you do?

22 A So that's where we had had a few beers. And we were walking back to try  
23 to find -- so the Kentucky guys were with us. We were trying to decide whose vehicles  
24 were closest to where we were. We had decided that Stewart's rental was going to stay  
25 in the garage. And so we were trying to get back to Whip's vehicle, except I don't

1 remember where Whip's vehicle was. But I know we went to go get the Kentucky guys'  
2 car, and then I think we go to Whip's vehicle. I'm not 100 percent sure. But basically  
3 we're just going to get the cars to go back to Virginia.

4 Q Okay. So after the garage meeting and the social gathering, you just went  
5 straight back to Virginia?

6 A Yes.

7 Q Okay. And then I wanted to ask you a little bit. So the individual that you  
8 mentioned that you the phone call with, Robert Caron? Is that his last name?

9 A Yes.

10 Q Who is that? Can you tell me?

11 A So he's the guy that was from Red Team One that I met right after -- on  
12 the -- I don't know, a couple of days, 6th maybe, 5th, 6th. He's the one that got me in  
13 touch with Andrew Giuliani. He's the one who got me in touch with Katherine Friess  
14 and all of that group while I was in Michigan.

15 Q Okay. And what does he do? What's his profession? Do you know?

16 A So my understanding is that he was former CIA, and he was now doing just,  
17 like, investigative work. And he had worked on -- so Robert actually has a very  
18 interesting history. And Robert was the one I have a couple of documents for that are  
19 basically the Russian collusion stuff during that investigation. They were at Trump  
20 Tower, and they were the ones that acknowledged that it was the spoofing coming into  
21 the line. Like basically it wasn't an organic -- so he's basically just been on the  
22 investigative team the whole time. Let's just put it that way.

23 Q Okay. And then you mentioned a couple of times and I'll just ask you  
24 quickly. This Red Team One, can you just describe to me what is that or what their  
25 involvement with the 6th is?

1           A     So Red Team One was basically where we were sending all of our affidavits  
2     and stuff that we were collecting while we were in Michigan, until I got other emails.  
3     And then I was still sending them to Red Team One.   And then I was sending them, like  
4     all the stuff that I had recorded and the stuff that was going on in Michigan from my  
5     personal side, and then also sending everything up there for, like, that we were collecting.

6           Q     And do you know -- can you just tell me -- I think you have before -- but who  
7     was on Red Team One or who did you understand to make up Red Team One?

8           A     So it ends up later being that Josh Macias is associated with Red Team One.  
9     I didn't realize that at the time.   Then I think there's, like, Admiral Kubic.   That's where  
10    you get into, like, a lot of general types, the military types.   I mean, he references later  
11    on -- and we can get into that, because that's after the 6th -- but he references, like, an  
12    association with, like, Clapper.   I think Hayden --

13          Q     Who is "he"?

14          A     Robert Caron.

15          Q     Oh.

16          A     He references Clapper, Jones, Elon Musk.   I mean, there's just, like, several  
17    people referenced in there.

18          Q     Okay.   And I just want to make sure I have this right, Crone, C-r-o-n-e?

19          A     I think it's just C-a-r-o-n.

20          Q     C-a-r-o-n.   Okay.   Great.

21                And then last question on this.   Red Team One, do you know why it was called  
22    Red Team One?   Were there other colored teams?

23          A     So that later becomes my question.   How many red teams are there?  
24    How many blue teams are there?   I don't know the answer, but it was weird that it was  
25    Red Team One.   So then I assume later there must have been other factions working.



1 Q Right. Okay. So you finished with the kind of social activities at the  
2 Phoenix Park Hotel and then head back to the hotel in northern Virginia?

3 A Yes.

4 Q Okay. And --

5 A I think we grabbed -- I think we grabbed food somewhere in there, but I  
6 don't remember anything.

7 Q Okay. And then once you're back at the hotel, just what happens then?  
8 Are you guys done for the night?

9 A I think everybody's done. I don't remember if that's the night that I went  
10 over to the mall, because I think I talked to Caron again. That may have been -- I don't  
11 know. Nothing exciting, I mean, just basic grabbing food. I think I may have run over  
12 to the mall. I don't know. That may have been earlier but not anything crazy.

13 [REDACTED] Okay. Great. Then I think, Marcus, do you have anything to  
14 follow up on that?

15 [REDACTED] Nothing from me.

16 [REDACTED] Okay. Great.

17 Then I think [REDACTED] might have some follow-up questions for you  
18 potentially about that Red Team One issue.

19 Oh, no, He does not.

20 Okay. Then as far as the evening of the 5th, I think I am done.

21 So [REDACTED] if you have --

22

BY [REDACTED]

23 Q All right. I'll pick up where we left off last week, Ms. SoRelle.

24 So we're going to fast-forward a day to January 6th, and you had just talked about  
25 you and Mr. Rhodes's movements from the hotel back to the Capitol. And I think we

1       were just starting to get into the meeting -- or not even -- when you met with other Oath  
2       Keepers on the northeast corner of the Capitol around 4:00 o'clock.   But I did want to  
3       backtrack a little bit.

4               And, Mr. Farah, can you please pull up exhibit 17?

5               We mentioned this in passing, but I just want to show you the message from the  
6       D.C. OP Signal chat.   And it looks like Horsewhisperer Texas who you told us was  
7       Ms. Marcia -- what was the last name again?

8               A     Strickler.

9               Q     Strickler.

10              And she sends a picture message of the Proud Boys.   So once we get that up, I  
11     just want to ask a follow-up about that.   I don't think -- hold on.   I'll try to pull it up  
12     myself.   All right.   Can you see it now?

13              A     Yes.

14              Q     Okay.   So this is at 11:55 a.m., I guess.   Were there any discussions that  
15     you recall with Mr. Rhodes, or any other Oath Keepers about the Proud Boys on  
16     January 6th?

17              A     No.

18              Q     Can you help us understand why Ms. Strickler would even send this message  
19     into the D.C. OP group?

20              A     So, she was -- okay.   Originally she was planning on going to D.C.   I mean,  
21     there was a discussion about coming I think somewhere around Christmas, because I had  
22     been -- I had actually been to her house.

23              And so if everybody is, like, kind of trying to imply, just -- just so you know, I mean,  
24     Marcia actually was not one that was, like, kind of a hard rider or anything like that.   She  
25     was actually trying to figure out what was going on with the elections in Williamson

1 County. I worked on that project with her. She worked with the legislature after  
2 January 6th.

3 So, I mean, I don't think she was coordinating. She was really just kind of in the  
4 chat, because she was supposed to go. Did not end up going because her -- I don't  
5 know. Her husband wasn't interested in her going. But she a lot of times was just  
6 giving -- like, if you look at a lot of their chat groups, right, you see they're giving stories or  
7 news or whatever.

8 And I think she was more, in my opinion, just showing what was going on, because  
9 she was watching. But I don't know. I mean, she was --

10 Q Okay.

11 A -- watching videos and stuff.

12 Q Do you recall Mr. Rhodes mentioning anything about the Proud Boys being  
13 at the Capitol the morning of January 6th?

14 A Nope.

15 Q Okay. No one in the group that you recall was tracking the Proud Boys'  
16 movements around the Capitol that morning?

17 A Nope.

18 Q Okay. So then, let's go back then to after the breach. And I'm going to  
19 share what is exhibit 18 with you. And these are -- this is another message from the D.C.  
20 OP group. So we're in this message. All right.

21 So the breach has already started. It's at 1:38. So individuals are trying to  
22 make their way towards -- they're already up on the West Plaza. They're trying to make  
23 their way into the Capitol at this time at 1:38 p.m. eastern time. We see here  
24 Mr. Rhodes saying:

25 All I see Trump doing is complaining. I see no intent by him to do anything. So

1 the patriots are taking it into their own hands. They've had enough.

2 Were you all back at the Capitol at this point?

3 A I think so.

4 Q Do you recall?

5 A I think.

6 Q Okay.

7 A But I wasn't -- I would guess that we probably were. But, see, you've got to  
8 realize Stewart, now if Stewart has other communications that I am unaware of, okay, I'm  
9 just talking about from my perspective --

10 Q Yeah.

11 A -- I mean, we never were on the other side. Like we were on the side  
12 where you were, like, the north -- north --

13 Q East side? The Supreme Court side?

14 A I did the same thing, and I think he was messaging the wrong coordinates at  
15 one point. But we were always up in that top corner. So all we could see was people  
16 just, like, rallying at the Capitol.

17 Like we -- I only saw, like I said before, when I went around to the back side, I was  
18 watching. Nothing super spectacular was happening until I saw the guy get up in the  
19 window cleaner thing, and he raises up. And then I see people, like, over at the door,  
20 like, chanting and tend to walk forward a little bit. But that's when the guys -- because  
21 the doors opened. They started pepper spraying out the door.

22 That's when Dario and Stewart basically grabbed me and are, like, come on.  
23 We're getting out of here.

24 And that's the only thing we really saw. I saw, like, the little roving pack of -- and  
25 I saw them numerous times. This -- it was this one little roving pack of, like, riot cops or

1       whatever. I saw them get into a tussle sort of with one of the guys. They shoved each  
2       other, and then they kind of continue on. But they're heading over to the stairs and  
3       stuff or the -- what would have been, like, the platform area where everything would  
4       have been, like the ceremonial stuff that was being set up.

5               Q     The inauguration platform.

6               A     I'm sorry.

7               Q     The inauguration platform?

8               A     Yes, that one.

9               Q     Okay.

10              A     But we never make it down there. And then at that point they, like, kind of  
11       pull me out. We go back over to the north side and kind of wait. Stewart's still trying  
12       to get ahold of guys. I'm just kind of watching what's going on. Really at that point all I  
13       saw was, like, I mean, there were elderly people. There were young people. They  
14       were just -- I mean, they were just kind of just roaming around and nothing crazy.

15              Q     I guess the question is though: What did he mean? What did Mr. Rhodes  
16       mean from what you understood him to mean with so the patriots are taking it into their  
17       own hands, they've had enough?

18              A     At this point where, you know, protesters and rioters are making their way closer  
19       to the building at 1:38 p.m., what did you take this comment to mean?

20              A     So this goes back to we were not -- I was not aware of anything -- the  
21       protestors are one thing, right? Let's just kind of go First Amendment here. You can  
22       protest whatever you want to protest. You cannot riot. Those are the two separate  
23       things here.

24              A     So if you're asking me, I would assume he was referencing protesters, right?  
25       Because when we walk up, that's why I told you, when we walk up, there's no barricades.

1     There's nothing there. There's literally just people walking around. Cops are standing  
2     around. There's nothing to indicate where you can go. There are people sitting on,  
3     like, railing, like the flower bed, stone kind of things. I mean, you kind of walk up. And  
4     it's, like, everybody's, like, in an amusement park or something, just roaming around,  
5     milling around.

6             So you have chanting going on. You have singing going on. You have praying  
7     going on. You have different -- you know, you have obviously what happened on the  
8     Columbus stairs. I did not see the doors open or any of that stuff because I wasn't over  
9     there. But you have, like, people up on the Columbus stairs.

10            So, I mean, I can't say that Stewart's talking about rioters as much as he's saying  
11     the patriots are here, making their voices known. So I can't distinguish between the  
12     two. One is protected, and the other is not.

13            Q     I guess I'm having a hard time understanding that Mr. Rhodes is referring to  
14     protestors, because even in the Signal chats there's discussions of providing protection,  
15     for example, Representative Ronny Jackson, because of something about safety. So  
16     how are there these discussions about safety concerns if you are all only thinking about  
17     protestors expressing their First Amendment interests?

18            A     So this goes back to the November rally that I told you about, right? So  
19     when we're getting over to the Supreme Court and we're getting on the stage, antifa is on  
20     the other side. Like, we're going to call them antifa. You can call them whatever you  
21     want to call them or who funds them. Both sides of the same people. It doesn't  
22     freaking matter anymore.

23            But the fact is, is there were agitators from the other side at that event. There  
24     were conflicts with them at multiple rallies. So the idea is everybody's concept -- and  
25     this is the same issue I had with the FBI -- to say that there were no concerns for the

1 safety of the people is bullshit. That's a fact, because I personally saw them pepper  
2 spraying Trump supporters and beating them up.

3 So, no, I'm not going down that line. I'm not playing that game. There's a lot of  
4 responsibility here, and it doesn't all just fall on the patriots. And I'm calling them  
5 patriots because that's what -- how they're indicated as.

6 Q Okay. So then, the 4:00 o'clock meeting then, this is when you first -- you  
7 said this last time, I believe. This is when you first become aware that certain Oath  
8 Keepers members went into the Capitol?

9 A Correct.

10 Q What was Mr. Rhodes' reaction to finding that out?

11 A Y'all are fucking stupid. What were you doing?

12 Q And what was their response when he asked them that question?

13 A They went in to help law enforcement.

14 Q So that's what Mr. Meggs and Mr. Gaines and others said that they went into  
15 the Capitol to help law enforcement?

16 A Yes.

17 Q Have you become aware since then that, for example, Mr. James was yelling  
18 at law enforcement officers inside the Capitol?

19 A Well, so this one gets a lot interesting, too, because it depends on which  
20 videos you watch.

21 See, there's problems with these narratives on everybody's side, because you also  
22 know that James, who is assaulted by an officer, because he's trying to get another officer  
23 out -- and there's an actually a video and audio of that full event that for some reason the  
24 DOJ doesn't want released, but I managed to find it on Twitter -- where he continues to  
25 then, after the officer assaults him, he turns around and assaults the officer back, which

1       you could argue self-defense.

2               But then the officer and him both realize they're working on the same team, and  
3       so then he is allowed to extract that officer from the mob that is attacking him.

4               Q     So you all have this meeting. I just heard that Mr. Rhodes' response was  
5       words to the effect of calling the individuals who went in "idiots." And individuals like  
6       Mr. James, Mr. Meggs, they all respond by saying they went in to help law enforcement.

7               A     Right.

8               Q     What happens after this meeting? Where did you-all go? What was  
9       discussed? What happens next?

10              A     Okay. I'm going to finish the conversation that occurred. So Kelly Meggs  
11       and that group tell us the story of, while they're up there, officers ask them to guard a  
12       window that had been busted out. They stood there for a few minutes. They've got  
13       video of it, it's been turned over to the DOJ, with the name of the officer. I could never  
14       locate that officer. I tried to locate him.

15              They also tell me about a situation that occurred near the stairs where they  
16       literally barricaded an officer until the other officers could get over there to them to  
17       protect him from groups that were coming in. Now, I know there's also some really  
18       great shots where you've got your roving pack of photographers that will then follow  
19       them around.

20              And then so you've got, like, these escalated moments that literally look, if you  
21       look at Anthony Aguirre's (ph) videos that were in the FBI field office from -- and I met  
22       with him briefly after the fact. He showed me all the videos. They're in the FBI field  
23       office in El Paso. If you look at those videos, you'll see that you have escalated moments  
24       throughout that event.

25              And one of the -- Amy Harrison later tells me and Anthony -- no, not Amy



1 Harrison. Scratch Amy Harrison. Anthony Aguirre tells me that it appears that he ends  
2 up following around a roving pack of photographers that are following the riot cops, and  
3 he ends up watching that it's almost like a staged event.

4 So there's lot of narrative issues on all sides of this equation. I will be honest  
5 with you on that 1,000 percent. I don't like that it's all falling on the right. The left has  
6 some of this responsibility, too. And that is where my question lies is who's working  
7 with who, but that's beside the point. Go ahead.

8 Q So where did you all go after this 4:00 o'clock meeting? What happened  
9 next?

10 A So after that, we go back to the Phoenix because Bianca, at that point, is  
11 checking in. I don't even know where Bianca's at. That's when she tells me that she  
12 came back and took a nap. And I'm, like, you had a staged event. I did think that was  
13 kind of odd that she went and took a nap while her event was going on. I know, I mean,  
14 and I see that, like, Stewart and I left. But I know I was legitimately freezing my butt off  
15 and was hungry and wanted to go watch the certification.

16 But it was weird for her to have actually rented the stage, spent thousands of  
17 dollars on it, and then disappeared from the event to go back to take a nap. But we  
18 went over there because she was just, like, Hey --

19 Q Who went with you?

20 A That was actually kind of the same group from the night before. I'm trying  
21 to think who all was there. I think I rode with Whip. We went in Whip's vehicle.

22 Yes, so earlier in the day Whip had parked. We had parked out by the Jefferson  
23 Memorial maybe, and walked in. And then later Whip somewhere in there goes and  
24 gets his vehicle and brings it up closer to the Capitol so that -- I mean, I just won't lie. I  
25 was whining because I was cold. So he goes and gets the car so that I don't have to walk

1 all the way back over there.

2 So, anyway, we go and get in his vehicle and go to the Phoenix. Actually, yeah,  
3 no, because I get in his vehicle. Go to the Phoenix. I think we go and get some more  
4 food and stuff because the curfew's coming into play. I don't know exactly what time  
5 that was, but we go and grab snacks and stuff like that. We hang out for a little bit.  
6 And then we're trying to figure out how to go get everybody's vehicle and get everybody  
7 out of there.

8 And so it was after dark. We weren't there a whole long period of time. Like  
9 we were just kind of snacking on whatever was there. We go get Stewart's rental out.  
10 We had debated just leaving it overnight. Yeah, I mean, we all just basically load up and  
11 go.

12 Q Okay. Was anyone there with Ms. Gracia, or was she by herself?

13 A It was same mix of people.

14 Q Okay. So Josh Macias, Gracia, the same group from January 5th?

15 A Yeah, I mean, yeah, I mean, it just looked like a bunch of -- everybody. It  
16 was kind of a repeat of the night before, just hanging out for a little bit. I don't think we  
17 were there all that long, because the curfew was coming into play. I don't really recall  
18 how long we were there.

19 I remember I was trying to figure out how to get out, like, trying to get -- basically  
20 we used that as, like, a coordinating point to try to figure out how to go get vehicles and  
21 all that stuff because of curfew and stuff coming into play, if that makes sense.

22 Q Yes, it does.

23 A And then there were some -- there were some guys that were there, other  
24 Oath Keepers that were there that were not there the night before. I mean, everybody  
25 was just trying to figure out where to go. But pretty much the bigger faction of Oath

1 Keepers, like the Florida crew and all those, they went there their own separate way.  
2 This was just like a handful of random people, and I would kind of say that was kind of  
3 collective across the board. It was just -- it was random people. It wasn't any -- we  
4 were watching some of the news on what had occurred. That's when I was really  
5 starting to process that this was a lot more than what I realized, because I hadn't seen  
6 any of the stuff that happened on the southwest side.

7 Q Okay. And you said that the Florida crew went their own way. What  
8 about Mr. Joshua James and the Alabama crew? Did they come with you, or did they go  
9 their own separate way as well?

10 A I think they were with us.

11 Q Okay.

12 A And, honestly, that's where Josh -- that's where I had a conversation with  
13 Josh about his whole experience.

14 Q Okay. Did he tell you anything about his experience providing personal  
15 security for Mr. Stone that day?

16 A Yeah, that Stone wasn't really leaving the hotel and they were just, like,  
17 sitting outside, because that was kind of what I was trying to figure out is, like, what the  
18 heck went wrong. Like how did you end up whatever? He said that Stone really just  
19 didn't come out.

20 Q Did he --

21 A I think they went downstairs once or something, but that was it.

22 Q Did he find it strange that Mr. Stone didn't leave his hotel room the whole  
23 day?

24 A Yes, actually.

25 Q Did you all find it strange?

1           A    Let me -- let me -- I'm not 100 percent sure --

2           Q    Please.

3           A    -- but I'm going to tell you what I think.  They did go down and outside for a  
4   little bit.  I don't know where they went.  I don't recall that.  But I do recall him saying  
5   they only left, like, briefly, and then they were back in the hotel and then Stone stayed in  
6   there.

7                   And so the thing was their goal was to actually escort him to the Ellipse, and that  
8   didn't happen.  So he was just basically, like, we were kind of, like, hanging out with  
9   Roger Stone.  Actually not even hanging out with Roger Stone.  They were outside his  
10   hotel room, sitting in, like, a little sofa area.

11          Q    Okay.  I do want to also just -- it seems like we're -- I'm assuming after this  
12   is when you all left the city and went back to Virginia?

13          A    Yes.

14          Q    Okay.  I do want to bring up just a few more chats from the day of the 6th, I  
15   guess, during the time period in question, during the Capitol breach, just to get your  
16   reading on it.  There's an exhibit.

17                   I'm not going to show you all these exhibits.  If you need me to show them to  
18   you, I can.

19                   But there's a message the Signal chat where Mr. Rhodes is instructing Oath  
20   Keepers to wear a blue armband on their upper right arm.  Do you recall Oath Keepers  
21   wearing a blue armband on January 6th?

22          A    No, I don't.  And that was actually one of the conversations that later  
23   Stewart and I were trying to figure out, what went awry with some of that stuff, because  
24   the blue armband actually was -- and if you go back and look at them historically, they will  
25   do that if they are working for, like, crowd control or, like, medic type purposes, because,

1 recall, if you do recall, there's a couple of people that were at the Ellipse and stuff like  
2 that, that are either doctors or paramedics, that type of stuff, have EMT training.

3 And so, my understanding is, is that the bands are indicative of -- because, if you  
4 recall, they were not supposed to be wearing their plate carriers and BDUs or any of that  
5 stuff.

6 So Stewart was just trying to give some way. And my understanding, based on  
7 what I observed, it was just trying to get some kind of way to, like, indicate who they  
8 were so that that's common, so they can coordinate with whoever's on the ground as far  
9 as law enforcement or paramedics or anything like that.

10 Q Okay. And I'm going to pull up what has been marked as exhibit 26.  
11 Okay. So on this document -- and I think we might have touched on this a little bit.  
12 But we see, again, from Ms. Strickler a message, saying:

13 Dr. Ronny Jackson. On the move. Needs protection. Has critical data to  
14 protect.

15 Do you know what the critical data was that Representative Jackson had to  
16 protect?

17 A No clue. And that is -- I don't know. I know Ronny Jackson's up in the  
18 Amarillo, Panhandle area. I know some of his staff. I have no earthly idea what that is.  
19 No clue.

20 Q Do you know if Mr. Rhodes or any Oath Keepers had a relationship with  
21 Representative Jackson or his staff?

22 A No.

23 Q Had Oath Keepers provided personal protection for Representative Jackson  
24 in the past?

25 A No, they have not. I would tell you that if anybody had Ronny Jackson's

1 more associations, it would be me.

2 Q Okay. And what are your association? You touched on it a little bit. But  
3 what are your associations with him?

4 A Just because I'm part of the Texas Republican Party.

5 Q Understandable.

6 And did you-all make contact with Representative Jackson on January 6th?

7 A No, we did not.

8 Q And did you attempt to make contact with him, or was it just chatter in the  
9 Signal chat?

10 A No, it was just chatter in the Signal chat.

11 [REDACTED] it looks like you might have follow-up.

12

BY [REDACTED]

13 Q Yeah, I was just going to ask. You mentioned that you know some of  
14 Representative Jackson's staff. Is that correct?

15 A Yes, I do.

16 Q Who from his staff do you know?

17 A It would be actually, like, local staff. Her name is Kelly Fest. She was  
18 actually, like, campaigning working for him. At that point he had just been elected and  
19 so it was just -- and that's just because literally the Texas Republican Party, like, she's part  
20 of that association. She's part of the committees and all of that stuff. So --

21 Q Could you spell her last name?

22 A F-e-s-t.

23 Q Okay. And how did you meet Ms. Fest?

24 A It's not that -- the SREC and all of that stuff in Texas is not that big. I think  
25 actually there was a guy named Jeremy Bravo I think maybe I met them through her.

1 But, I mean, I'm just saying, like, there's like a lot of different ways they're all kind of  
2 crossed over.

3 Q Right. Do you know did Ms. Gracia have a relationship with  
4 Mr. -- Representative Jackson or his staff?

5 A No. No. She would be a totally different -- look, she -- so if you want  
6 Texas politics, I'll give you this: You've got different factions in the Republican faction  
7 stuff. And I -- that would not be a common crossover. Not saying that Bianca wasn't,  
8 like, part of her community stuff. She wasn't part of the State aspect of it.

9 Q And then, do you know if Ms. Fest or any other of Representative Jackson's  
10 staff ever met Mr. Rhodes?

11 A No.

12 [REDACTED] That's all I have. Thank you.

13

BY [REDACTED]

14 Q I'm going to pull up what has been marked as exhibit 29 now. So in this  
15 message it appears this is right after I believe you all left the Capitol Grounds. You might  
16 be at the Phoenix at this point, or maybe on your way out to Virginia.

17 But Mr. Rhodes says that he was there on January 6th, during the Capitol breach.  
18 Patriots stormed in. Not antifa.

19 Do you agree with that statement that patriots stormed the Capitol, not antifa?

20 A I don't. And I actually argued with Stewart over that because, like I told  
21 you, I saw the Eastern European bloc. Stewart was too busy on his phone. That's the  
22 thing that's so stupid about Stewart, is that I was watching all of the different groups.  
23 And I, I mean, the Russian-speaking or the Eastern European-speaking, guttural-sounding  
24 guys were skinheads.

25 And I'm assuming they were Ukrainian now. But at the time I'm watching that

1 group, I watched them for quite a while. So, and I don't know who brought them in. I  
2 don't have a clue, but somebody should figure that out. It was a pretty big pack. It  
3 was a giant pack, and they were the ones taking out the north door. They were also,  
4 ironically, on the north side at the top when I was over there. I just didn't really get  
5 close enough to them at that point to really figure out who they were. They just looked  
6 rough.

7 But when they were on the north side, banging on the door, I was listening to  
8 them communicate. They were not speaking English, and it was not Spanish. I'm  
9 pretty familiar with. Pretty familiar with Chinese. You know, I've worked on the  
10 border. I know a lot of what comes across. So I'm pretty sure it was a Eastern  
11 European-sounding voice speaking, yelling.

12 Q I'm going to pull up another exhibit for you, exhibit 31. And these are all  
13 still from the 6th. Again, Mr. Rhodes says:

14 Thousands of ticked-off patriots spontaneously marched on the Capitol and sent  
15 the message that they will not live under an illegitimate ChiCom puppet regime. You  
16 can't handle that. Hit the door. You ain't seen nothing yet.

17 Do you know what Mr. Rhodes meant by "you ain't seen nothing yet"?

18 A I have no earthly idea on that one.

19 Q Okay. And, again, right, he's characterizing the folks who marched on the  
20 Capitol as patriots and not antifa so but --

21 A I --

22 Q Huh?

23 A I was just going to say I was arguing with him at that point over that because  
24 I was, like, there's a whole lot more to this story, Stewart.

25 Q Right. So let's get into you leave the D.C. area. You all go to northern



1 Virginia. I know you all went to Olive Garden, right? Is that correct?

2 A Correct.

3 Q Who all went with you to Olive Garden?

4 A So I do not know his name. But it was Josh, Whip, I think the Kentucky  
5 brother or cousins, so the two Kentucky guys. I think maybe Ed Vallejo. I don't know.  
6 Stewart was communicating. When we were leaving Virginia, he was already getting  
7 blown up by media, I know the LA Times and a couple of others. I know we get over  
8 there, and they're coordinating where to go eat. And he's talking to 1AP at that point.

9 And I don't know. The guy was out of Virginia. I thought it was a Robert but  
10 it -- I don't know. It's not Rob Lewis, but I don't know who he was. But we get there,  
11 and we meet up with that group. And, like, I -- it was Josh, Whip, me, Stewart, Ed  
12 Vallejo, I think. I know Josh James, the Kentucky cousins. That's it from that group.  
13 And there's, like, four or five from 1AP.

14 Q I guess what -- how did the 1AP guys come about going to Olive Garden or  
15 how did that get arranged?

16 A They were communicating with Stewart. I don't know.

17 Q Okay. Okay. So you weren't privy to those conversations between  
18 Stewart and 1AP?

19 A No. I think it was text communications and it was just a -- he asked me,  
20 like, where do you want to go eat or something. I said I don't care. Like I'm hungry,  
21 like, whatever.

22 And so then the next thing I know he said we're going to meet some of the guys at  
23 1AP at the Olive Garden. And they were trying -- oh, I think I was looking up -- I may  
24 have been actually looking for restaurants that were around our hotel, because they're  
25 from Virginia, so they were heading back that way. And I know there was some

1 coordination on that. I don't recall if I was the one looking it up, but I may have been  
2 trying to find a hotel because I know he was driving.

3 Q And you don't -- do you recall who Mr. Rhodes was talking to from 1AP? I  
4 know you weren't privy to the conversation. But do you know who he was talking to at  
5 all?

6 A So that's the guy that I was telling you from Virginia. I thought his name  
7 was Robert. I don't know that for sure. I don't really remember his name, but I know I  
8 sat across from him at the restaurant. He had his girlfriend with him and then -- or  
9 maybe it was another guy's girlfriend. I don't know. There was a chick and then, like,  
10 three guys. I don't know.

11 Q And do you recall what was being discussed at Olive Garden then, I guess?  
12 What was the general mood? What was being discussed by everyone who was at  
13 dinner?

14 A What happened at the Capitol.

15 Q And, again, what was the response? And what happened at the Capitol,  
16 I'm assuming that's about people going into the Capitol, breaking into the Capitol,  
17 correct?

18 A That, and I actually was kind of, like, I was, like, honestly I was pissed off  
19 because I wanted -- I wanted them to go through the congressional, full process.

20 See, this is what's -- this is what they messed up on their narrative. This is why  
21 their narrative is so screwed up. Anybody with half a brain would know you wanted  
22 them -- if you were going to do something stupid like this and you were a Trump  
23 supporter, you wouldn't have done it on this day, because there was evidence that I  
24 know, because groups were working on, presented through, and I didn't present it, but  
25 was being sent up from the different States regarding the issues in the different elections,

1 right, and especially those five States.

2 So the issue is, is those of us that were actually, legitimately trying to work on this  
3 election process knew that the information that was necessary and needed was being  
4 provided to the Congressmen. So to blame it on the patriots is actually pretty effing  
5 retarded, because we, personally, wanted them to go through the congressional hearing  
6 and actually have the meetings and be able to do whatever it was. I'm not saying that it  
7 would have been successful; I'm not saying there would have been pressure for that.  
8 What I'm saying is, is that we would have seen that process occur.

9 So for people who are actually Trump supporters to be the ones that were  
10 implementing this is absolutely insane because all of us wanted the lawful challenges to  
11 be able to be presented, not necessarily winning, but just for the information that we  
12 knew was not being presented in the legal cases, to actually be presented through  
13 Congress.

14 Q And which congressional members were you working with to get this  
15 evidence presented to them?

16 A I was actually just the evidence gatherer, right?

17 Q Okay.

18 A So I told you there was a group of, like, 30 or 40 attorneys that were actually  
19 working on this stuff on the side that was trying to make sure that all of the right  
20 information was getting into in the right hands, because we're the ones that also tried to  
21 work on the Texas case, although it changed. We were the ones that were just trying to  
22 get, like, the actual, lawful challenges to the table as opposed to the focus on Dominion.

23 Q Okay. I guess what was Mr. Rhodes' overall mood at the dinner after, you  
24 know, the Capitol's been breached and you all are discussing it? What was his overall  
25 mood?

1           A    It wasn't anything -- it was just, like, what the hell. I mean, really, if  
2   everybody wants to think that Stewart was part of orchestrating going inside, he was not.  
3   I don't know what Kelly Meggs and all of them knew. I don't -- I don't know, because I  
4   don't have those communications. But for the group of us that were sitting there, this  
5   was, like, looking at the situation. As a matter of fact, I know I was kind of, like, this is  
6   crap, because they ruined a perfectly good opportunity to, like, actually have a  
7   meaningful challenge to the election.

8           [REDACTED] All right. I believe [REDACTED] might have a few follow-up  
9   questions for you.

10

BY [REDACTED]

11           Q    Hi, Ms. SoRelle. It's nice to see you again.

12           A    Hello.

13           Q    I wanted to ask about 1AP, and you mentioned that you didn't quite  
14   remember folks' names, but I wonder if you might recognize them if I pulled up photos.

15           A    Maybe.

16           Q    All right. Let's see if this works.

17                Are you able to see that?

18           A    Are you talking about the guy in the front?

19           Q    Yeah.

20           A    No.

21           Q    Okay. This is Robert Patrick Lewis. So I was wondering if the Robert you  
22   mentioned might be him.

23           A    No. I know Robert. That doesn't look like the Robert but -- oh, my gosh.  
24   How many Robert Patrick Lewises are there? No, that's not him.

25           Q    Okay. And this is a photo of him from January 6th. So he would have

1 looked like this presumably.

2 A That was not him.

3 Q Okay. This is Philip Luelsdorff. Does he look familiar?

4 A That guy looks like the guy that was sitting across from me.

5 Q Okay.

6 A I don't know if you have any other photos of him, but that would be more of  
7 what I was looking at.

8 Q Got it. Great. And this guy on the left with the beard, this is Jeffrey Flohr.  
9 Does he look familiar?

10 A He was not there.

11 Q Okay.

12 A And is that Robert Patrick Lewis that's on the other side over there?

13 Q Yeah, with the dark beard?

14 A Yeah, that -- he wasn't there. So Philip --

15 Q Say that again.

16 A Philip -- he was not there. Neither of these guys were present. It was a  
17 guy that looked like the other guy that you had pulled up.

18 Q Okay. Got it.

19 A Long hair, kind of spiky. I don't think he was as, like, clean-shaven. Like I  
20 remember him kind of looking, like, a little rougher but --

21 Q Sure. Was he really tall? Do you remember that?

22 A I think he was pretty tall.

23 Q Okay.

24 A I don't think he was like -- I don't think he was Seth Keshel tall, right, but he  
25 was a taller guy.

1 [REDACTED] That's it. Good. Thank you.

2

BY [REDACTED]

3 Q So when did you all -- I guess, after Olive Garden, did you do anything else  
4 that evening?

5 A So that's where Marcia Strickler starts blowing up my phone while we're  
6 sitting there, eating. I'm trying to think of who else. I think maybe -- I may have texted  
7 with my kids or something to that effect. I mean, like, everybody was trying to figure  
8 out what the hell was going on, right? So I think my family was checking on me.

9 I know that's when Marcia Strickler started contacting me, saying that, You need  
10 to get Stewart out there. I think they're looking for him.

11 And I'm, like, where? And I'm like why? Because I hadn't -- I mean, we were,  
12 like, Stewart was never down in the mess. Stewart didn't go inside. He wasn't  
13 orchestrating it. I mean, there was -- there was -- for me, I'm like, why, I don't  
14 understand.

15 And so, at that point, I go and I get Stewart and I'm, like, Stewart, I don't know  
16 what's going on. You need to talk to Marcia. But I'm like -- I'm, like, this is freaking me  
17 out. I don't want to be part of a manhunt. Like I don't know. I didn't do anything.

18 Q Right.

19 A So it was, like, basically it started turning into this, like, avalanche of  
20 everybody's phones blowing up. And then it's, like, let's just go. Let's just get out of  
21 Virginia. We don't know what the hell's going on. And I don't want to have any issues.  
22 Nobody wanted to have any issues. It wasn't even that.

23 As a matter of fact -- and I know that one with of questions that people ask was  
24 during that conversation that's where I say we got to take it back to the States. I mean  
25 legally take it back to the States, not go crashing capitols in the States, which is the same

1        thing I did with the rally series.

2                So it was not in promotion of violence or anything like that.    It was, like, we got  
3        to go do the work of the States on the elections.    We got to go do the work at the States  
4        in getting everything under control.

5                And at this point, mind you, I knew this was a left-right issue.    This was not me  
6        just saying that I thought that, you know, the Democrats were evil.    At this point I  
7        realized both sides of the equation has an issue with manipulating elections.    So at that  
8        point I was really just wanting to give the people their elections back.    It had nothing to  
9        do with a political party.

10        [REDACTED] Okay.    I believe [REDACTED] has follow-up.

11                BY [REDACTED]

12                Q    Yeah, and I'll note for the record that senior investigative counsel [REDACTED]  
13        [REDACTED] has joined the call.

14                Ms. SoRelle, before we leave the Olive Garden, I just have a quick question for  
15        you.    I recognize this is sort of an odd question.    Do you remember what you ate and  
16        drank at the Olive Garden that night?

17                A    Um --

18                Q    We had -- we've received the receipt from the meal that night.

19                A    Oh, no, because I can't tell you what I ate.    I just I'm, like, I don't know if I  
20        got -- I don't think I got fettuccine Alfredo.    I think I got -- I don't know.

21                Q    There is a fettuccine Alfredo on the receipt.

22                I was interested --

23                A    I do not recall.

24                Q    Do you recall drinking a Bellini peach tea?    Does that ring a bell?

25                A    That, I did drink.

1 Q Great. Thank you. Just wanted to pin that down.

2 [REDACTED] Thanks. You can have it back, [REDACTED]

3 BY [REDACTED]

4 Q Thanks, [REDACTED]

5 So after Olive Garden, you said you spoke with Ms. Strickler and went back to the  
6 hotel. Is that correct?

7 A Yeah, but we got our stuff.

8 Q Okay.

9 A Because at that point everybody was, like, it's time to go.

10 Q I want to pull up more chats. This one's from the next morning, so January  
11 7th at, I believe it's about 5:54 a.m. And this is going to be exhibit 32. So one second.

12 So in this exhibit it looks like -- do you know who "Landon B" is, by the way?

13 A That's one of the Kentucky guys.

14 Q Okay. One of the Kentucky guys you've been talking about. Okay. So it  
15 looks like Landon B said:

16 And like Stewart said, if Trump won't do Insurrection Act, then we will walk the  
17 same path as Founders of defiance, nullification, raising militia, and mutual defense.  
18 I've got a militia to organize.

19 So it sounds like the morning after, right, or I just read the words. What's going  
20 on within the group the morning after?

21 A That is exactly, like -- so actually Stewart is with Landon at that point. And  
22 because Stewart basically was of the opinion, and you can read that in the article, that  
23 basically, I don't -- they didn't want -- in case they were coming after Stewart, because  
24 Marcia was trying to -- I don't want to say pin it on Stewart but, like, trying to, like, scare  
25 the shit out of us.



1           So Stewart's, like, in case law enforcement or any of us have an issue, like, just  
2       because, if you notice, whether y'all agree or not, they haven't exactly been pleasant  
3       when they're busting in people's doors, doing it raid-style like we would do down at the  
4       border when we were busting a cartel house, okay? They're coming in with flash bangs.  
5       They're coming in with, like, full armored shit.

6           And So Stewart didn't know at that point what that was going to look like, or if  
7       they were just going to murder him because they don't like him. I don't know. It  
8       seems crazy. But at that point, when you're thinking that kind of crap, he was like, Hey,  
9       you just go on. Do your thing. I don't want you getting in crossover with any of the  
10      shit that I would be in, if they were to come after me.

11          So I was just driving back, and I stopped and got a hotel room and all that stuff on  
12      the way back. I was in the rental car, and he went with the two Kentucky boys. They  
13      were headed back to Kentucky.

14          Q     So at this point it appears that Mr. Rhodes was nervous about some type of  
15      law enforcement action following January 6th? Is that fair to say?

16          A     Well, but that's because that's what I'm saying. We were fine until Marcia  
17      Strickler started blowing up the phone, saying basically the media's going nuts. They're  
18      going to come after Stewart. And we were just, like, Why? We don't understand.  
19      And it wasn't even -- it wasn't even, like, a lack of cooperation on Stewart's part. It was  
20      the fact of the escalation of the events.

21          Like they -- and it's true. Like even the media inquiries that were coming in were  
22      pretty harsh towards Stewart, just while I was sitting there, listening to the -- because he  
23      tried to talk to a couple of them. And they were just, like, accusing him of basically he  
24      was out there, murdering people. I mean, like, it really was pretty over the top.

25          Q     I want to direct you to exhibit 33, which is another message from January

1 7th, so the day after. In this one, we see a message from, again, Ms. Strickler and then  
2 Kelly Meggs. And then you come in and this is in the D.C. OP, Jan 6th. You say:

3 Please delete the Signal chats, all of them everywhere?

4 I guess just walk us through what's going on here. Why are you telling  
5 everybody to delete --

6 A Okay. So I will plead the Fifth on some of this but -- because it gets a little  
7 weird.

8 Q Okay.

9 A But I had already had a full conversation with organization on it being law  
10 enforcement compliant back in November, December, okay? What I was getting  
11 frustrated with is this continual conversation by all of them where they're continuing to  
12 discuss this, and I wanted them to shut up. And I had already told the guys, nobody  
13 needs to be discussing the 6th in there because there are guys that went inside. And at  
14 that point it was starting to be, like, an issue, right?

15 So most of what I did for the next, like, following week is I was getting tired of  
16 listening to them to continue discussing shit that would have waived their potential  
17 defense.

18 Q Okay. So was this coming from you? Or did Mr. Rhodes instruct you to  
19 tell folks to delete the chats?

20 A No, that was actually, at that point, I was, like, quit talking about -- and I  
21 didn't mean -- so this is where it gets kind of weird. I know law enforcement can get  
22 anything they've got with a warrant. I know that. I had read that back in November on  
23 Signal specifically. We had had a full debate over whether Signal was trustworthy or  
24 not.

25 And I said, Guys, right here on their website it says we are law enforcement. We

1 cooperate, right, which means it may be encrypted at that point, but it's saved  
2 somewhere, because that's how it is.

3 I'm a former prosecutor. I have gotten numerous apps. It doesn't matter what  
4 it is. I know that law enforcement can get access to any and everything for the most  
5 part, because I've done it. What I wanted them to quit doing is quit hassling over,  
6 because I was listening to calls. I was talking to people. I'm, like, Guys, just shut it  
7 down. Just get rid of it. Get out of it. Go away.

8 Now did I say things maybe possibly not the best way? But you also have to  
9 understand, I thought we were in a manhunt. It wasn't for law enforcement purposes.  
10 I'm just scared, and I wanted everybody to shut up, and just get out of it. Stop going.  
11 Stop having these conversations. It's just not healthy for anybody who has a potential  
12 defense in this, because it's looking like you guys are the bad guys. And I was not  
13 getting that impression in my communications with any of them.

14 And as a matter of fact, there's other chats where I'm, like, Call me. Quit talking  
15 about it. You've got a defense. You have no right to give evidence against yourself.  
16 And I knew they had access to everything anyway. So it didn't matter. Plus, everything  
17 was up on FISAs at that point, and I knew that from the very beginning, too. So what  
18 the hell?

19 Q Okay. Let's see. I'm going to pull up -- actually I want to pull up one more  
20 chat from the 7th. So this is from the 7th. Again, it's at 6:58 p.m., so later in the day.  
21 You're telling people to go to their homes, POTUS in action. What does that mean?  
22 What did you mean when you said "POTUS in action"?

23 A I'm just -- let them go do their thing. You guys get out of it, because the  
24 next day, at that point you saw, like, you have all these people claiming that he was going  
25 to invoke the Insurrection Act possibly, right? If you just watched media at that point,

1 I'm, like, just let them do their thing. I wanted them to go home. I didn't want any  
2 shit. I didn't want anybody up anywhere. I didn't want anybody doing everything.  
3 Just go home. Just go home. And some of that --

4 Q So even -- sorry. Even the day after, you were -- not you but, like, Oath  
5 Keepers, you, as well, were thinking that, you know, President Trump might invoke the  
6 Insurrection Act even the day after?

7 A Well, because at this point, the challenges didn't get to occur, right?

8 Q Correct.

9 A See, this is where their narrative is screwed up, because I know what  
10 evidence was presented to them or given to them. I know what evidence should have  
11 been addressed.

12 And what I'm trying to tell these guys, because if you listen to the damn media,  
13 everybody's getting all butt heard. Everybody's upset. Everybody's whatever. I'm  
14 just trying to get the guys to go home. Just go home. There's nothing to see her.  
15 Just let them do their thing is what I'm trying to say. Just let POTUS do his thing. If  
16 he's going to do something, let him do it. It's his action.

17 Beyond that, what I witnessed was bullshit, because I wanted them to have their  
18 congressional hearings. When I got to the hotel that night, guess what I did? I stayed  
19 up, watching the final shit and realized, Oh, look, this is what they're going to do. This  
20 was a great cop-out guys. Way to go, establishment. Way to forget, because  
21 remember I saw the Ukrainians. Remember I saw the roving packs. Remember I saw  
22 that the narrative was already bullshit.

23 So I don't know who coordinated what. But I know that real Americans, real  
24 conservatives in this country would have wanted that hearing to take place when it  
25 should have taken place so that there could have been a meaningful challenge.

1           As a matter of fact, at that point, I'm saying, let them sort their crap out. They've  
2       screwed this up, and I'm blaming Congress for this. But I would not have wanted to  
3       delay any of that certification process. This is why their charges are bullshit.

4           Q     Okay.

5           A     And neither would have any of these people, by the way, just for the record.

6           Q     So walk us through, you leave D.C. I guess how -- where do you go?  
7       What's the route you take in the next couple of days?

8           A     So then I go down through -- I actually wanted to -- I actually went on a  
9       tourist stop. I wanted to go see Mount -- is it Mount -- one of our historical sites. So --

10          Q     In what State?

11          A     It's still in Virginia. I go --

12          Q     Okay.

13          A     Actually I'm, like, I'm going to go see but everything is closed for COVID. So  
14       it was a waste of time.

15                But then, at that point, I'm, like, I'm going to go get Stewart and meet up with the  
16       Kentucky guys, because they decided, you know, we're okay. Nobody's coming out to  
17       get us. The world isn't ending, and then, yeah.

18          Q     Did you go to Mount Vernon? Is that where you went?

19          A     Yes. Yes. I was trying to go. Was it Mount Vernon or not? I was like.

20          Q     Okay.

21          A     Look, you've got -- so the probably following 3 or 4 days is like literally a  
22       traumatic experience, because never in my life would I have ever labeled myself a  
23       terrorist, right? And all of a sudden everybody's a terrorist. I'm getting calls from  
24       everybody under the sun. I don't even know these people, threatening me. Like I've  
25       got the State Bar of Texas president calling to check on me. I've got, like -- no, no, and it

1 was all bullshit. I'm sorry. Furthest from.

2 Q When you went to Mount Vernon on the 7th, was Mr. Rhodes with you at  
3 this point?

4 A Nope.

5 Q Who was with you?

6 A Nobody. I was just by myself.

7 Q Did you get a rental car? I know you rode in with Mr. Rhodes. I'm just  
8 trying to understand how you --

9 A I had Stewart's rental car. And just for the record, I had Stewart's phone.

10 Q Okay. And you had Mr. Rhodes' phone. Okay.

11 And do you know who Mr. Rhodes was with at this point?

12 A He was with the two Kentucky boys. Look, we can -- we can play games on  
13 whether or not Stewart's an asset or not, but I know he has contacts within the FBI, okay?  
14 You know, you heard those narratives get spun out. And that's why the right's having a  
15 good old time for trying to blame him for being an FBI contact.

16 I figure this out later, but at the time I'm babysitting the phone. So I know later  
17 in hindsight I suspect Stewart's, like, let me just get out of harm's way. And I'll get ahold  
18 of my FBI contacts, right? So --

19 Q Got it.

20 A -- at that point one of the guys tells me to -- I keep a lot of Stewart's shit,  
21 actually. Stewart is just physically with those guys, and I just take off in his rental and I  
22 go get a hotel room. I watch the certification.

23 I get up the next morning. I can't actually go on the joyride because I'm, like,  
24 trying to breathe. I'm trying to figure out what the hell's going on. I'm trying to sort  
25 shit out. I'm calling home, checking in, whatever. It's kind of a blur. But I do recall

1 thinking I was going to go see a historical site, not to blow it up or anything, not to go  
2 shoot anybody, but to actually, like, go see it because I'm driving.

3 Q Right.

4 A And I'm not going to overthrow, you know, Mount Vernon.

5 Q When do you reconnect with Mr. Rhodes again?

6 A That night maybe.

7 Q The night of the 7th?

8 A Uh-huh.

9 Q Okay. So you see him again on the night of the 7th?

10 A I think so.

11 Q And where do you meet up with him at that point?

12 A See, this is -- I'm telling you, there's, like, some PTSD crap going on here  
13 because I don't -- I'm not -- I'm the furthest thing from a terrorist, and all of a sudden,  
14 we're domestic terrorists. So, yeah, I --

15 Q Okay.

16 A -- some town, somewhere, somewhere near West Virginia maybe. I -- I  
17 don't know. I'm sure everybody's got my GPS coordinates. Y'all can figure out where  
18 we stopped. I mean, this is how dumb it is. I mean, let's be real. This is why none  
19 of --

20 Q Okay.

21 A -- it really makes sense because I'm, like, yes, law enforcement was all up in  
22 everybody's business already.

23 But go ahead.

24 Q All right. I'm going to show you another exhibit from the afternoon,  
25 evening time of January 7th, when I think you're starting to get in touch with Mr. Rhodes.

1           So you say here that Mr. Rhodes is monitoring through the -- through your phone.  
2       So were you sharing messages, finding out what was coming through the Signal chats  
3       with Mr. Rhodes at this point?

4           A     No.   No.   I wasn't --

5           Q     Okay.   So --

6           A     So, wait, what night this is?

7           Q     It's the night of -- oh, sorry, this is January 10th.   So you're back with him at  
8       January 10th.

9           A     Yeah.

10          Q     Was -- was Mr. Rhodes checking messages through your phone at this point?

11          A     So, yeah, but we were all -- I think we were back in Texas by that point.

12          Q     Okay.   That's great.   So that's what I was going -- so you stop in some  
13       town in West Virginia on January 7th.   Do you go the same route to get back to Texas  
14       that you took to get to D.C.?   Do you recall, like, stopping in Mississippi or Alabama or  
15       anywhere like that?

16          A     I know we go back to Tennessee.   I know Stewart's driving one of the  
17       Kentucky boys' car.   He kills it.   I get a rental in some town.   I have no clue what it is.  
18       It's snowing.   It was, like, icing and sleeting.   He's sliding all over the road.   The car  
19       overheats.   I don't know.   So he puts it in a shop there.   I get a rental car.   We drive  
20       back to Texas.   I know we go through and see Josh James.   I think we have dinner with  
21       Josh James.

22          Q     And Mr. James comes with you all, right, back to Texas?

23          A     Yeah, he goes back because James is going to come hang out with me,  
24       because, look, regardless of why it sounds suspicious, why everybody's, like, Oh, why are  
25       you all guys congregating, the reality was there really were -- my phone was being blown



1 up at the office, at -- I was getting messages on Facebook. I was getting complaints to  
2 the Bar. The Bar was blowing up. I talked -- that's why I talked to the Bar president.

3 Stewart was going to like -- because I was going to go back to Steve -- I was going  
4 to go to Steve Vanderbol, because I talked to Steve Vanderbol at that point, and we're  
5 going to work on the case. But actually why I was meeting with Bianca in the first place,  
6 just for the record, is that was the plan, is that after that, after the 6th, I was going to get  
7 that drafted and get it over there. That's a whole other fun story if anybody wants to go  
8 through Steve Vanderbol and Paul Davis and all of them were. That's a great story.

9 But I end up going back to Steve Vanderbol's place and then Stewart -- I don't  
10 know if Stewart just leaves his phone all. I don't know where Stewart's phone is at that  
11 point. I don't know why. He's coming in and out and checking in on me. We picked  
12 up Josh. He goes and stays with me. Oh, because I had never met Steve Vanderbol,  
13 too. And so there was a concern with me going to stay at a random guy's house by  
14 myself --

15 Q Okay.

16 A -- who worked on the case because Steve was associated with Red Team  
17 One, and all of those guys.

18 Q Got it. So you go down. You mention that you all have dinner with  
19 Mr. James in Alabama. He comes with you to Texas. So in the DOJ indictment, and I'm  
20 just going to go through a list of dates, kind of like what we did on the way, for your  
21 actions on the way to D.C.

22 A Okay.

23 Q So on January 10th, Mr. Rhodes spent about \$6,000 on spikes, bipods, scope  
24 mounts; January 11th, \$1,500 on scopes, magazines; January 12th, \$7,000 on hundreds of  
25 rounds of ammunition, duffel bags, magazines, rifle scopes; on January 13th, \$1,000 on

1 firearms parts; and on January 14th, \$2,000 on firearm parts, mounts, magazines, scope  
2 leveler, targets, ammunition, gun case holsters, gun case maintenance, equipment, and  
3 others.

4 Do you remember these purchases at all between January 10th and January 14th?

5 A I was not with Stewart during any of that timeframe.

6 Q Okay.

7 A He was in and out. He was coming into Steve's place to check on me but  
8 that's also where -- and I know that Josh James was going with him for some of it.

9 Josh tells me at one point that Stewart's really scared, and he's paranoid, and he's  
10 getting afraid and he thinks that war's coming.

11 But I can't tell you that I don't know that that's -- he's ready to go mount and  
12 offense as much as he's scared shitless, and thinks that literally, because, like, this is  
13 another place where I know, based off listening to the people that I'm dealing with, that  
14 everyone thinks that Great Reset is coming, that this is like -- you've got to look at this  
15 from a bigger perspective. It's real great when everybody's like, Oh, look at this people.  
16 They went and did this crap.

17 No, the reality is when that virus started, we started digging into information.  
18 We started seeing all of the stuff. We saw what documents would disappear off  
19 government websites. We saw, like, you know, where there were going to be issues  
20 with the mRNA vaccines because they never made it through animal trials and then those  
21 would disappear.

22 So there was a lot of stuff that was, like, concerning. And I think at that point he  
23 thought literally -- and I don't know this for sure, but I'm just telling you what, like, Josh  
24 was kind of expressing -- that he thought that literally we were going to see, like, U.N.  
25 helmets rolling in and that this was going to be part of this Great Reset going to take over

1 the United States.

2 I'm not saying I agree with that. I'm just telling you that these people were  
3 afraid. I was afraid, because you even have John Kerry and Biden and everybody still  
4 talking about things like Great Resets and crap like that. I mean, we're not fully crazy.  
5 We just don't know what the fucking plan is. How are you going take us over? How  
6 does this country collapse? Please reset.

7 Q Got it. So, again, you mentioned the Civil War piece. I know that  
8 Inauguration Day, the indictment talks about how Joshua James says that, if nothing  
9 happens, talking about, you know, going through with the inauguration of President  
10 Biden, it's Civil War 2.0.

11 Is this kind of along the same lines of what you're mentioning here with the Great  
12 Reset, Civil War that was being discussed by the Oath Keepers?

13 A So, I mean, realistically that's the whole point in all of this, right? This is  
14 why I wasted my time getting CIA guys and everybody else through anonymous, spending  
15 hours digging up every playbook that you could possibly see so that you could understand  
16 the mindset of the people that were actually what I would consider my people, not the  
17 Ukrainians, not the antifa, not Proud Boys, not all the assets crowd, but the actual people.

18 I wanted you to see that we are fully aware that there was another plan in play.  
19 What we didn't know is what that was going to look like for us. Are they going to harm  
20 us? Are they going to -- at the same time you have people stockpiling chickens and  
21 seeds and everything else, right? That's the new commodity in the south.

22 What you don't understand is people are afraid of what our government is going  
23 to do, so that the military industrial complex can get their contracts through the Great  
24 Reset. That is part of the WEF plan. That's on a website. This isn't farfetched.

25 So, no, none of this is offensive in nature. All of it is defensive in nature, and it's

1 absolutely justified. Now what you guys should actually be trying to figure out is which  
2 one of those people on the panel up there actually know what that is. Who's the traitor  
3 to this country? That's what actually should be trying to -- people should be trying to  
4 figure out.

5 And you should probably give me a break right now.

6 [REDACTED] All right. We'll take a recess and come back at 11:40 eastern  
7 time. Thanks.

8 [Recess.]

9 [REDACTED] All right. Why don't you come back, Ms. SoRelle? We'll go  
10 back on the record once you come back.

11 Ms. SoRelle. I'm here.

12 [REDACTED] All right. We will go back on the record at 11:41 a.m., eastern  
13 time.

14 BY [REDACTED]

15 Q Just another quick follow-up about Texas after January 6th. Did Arizona  
16 members, like Mr. Vallejo and others, did they come to Texas as well?

17 A Not that I'm aware of, no.

18 Q Okay.

19 A Whip --

20 Q Whip comes, and Whip comes to provide personal security for you, right?

21 A Right, because Josh is having issues with his wife.

22 Q Because Josh is having issues with his wife?

23 A Uh-huh.

24 Q What, I guess -- how does that tie in with Whip protecting you?

25 A Because Josh was the one that was babysitting me during that time.

1           Q    Oh, I understand. I understand. And Whip was with you for about a  
2 month, right?

3           A    Yeah.

4           Q    Okay. So I know you've talked a little bit about your interviews with the  
5 FBI. You mentioned that throughout this deposition. So how many times have you  
6 interviewed with FBI approximately?

7           A    Twice.

8           Q    Twice. And when did those occur?

9           A    One in May, when I was doing -- I was actually in my hometown. Stewart  
10 went with me because I was doing the Sanctuary Cities for the Unborn election in  
11 Lubbock. And then we met with the FBI there. And then they came. And I spent, I  
12 don't know, 4 or 5 hours with them, maybe even 6, when they took my phone in August  
13 of --

1

2 [11:42 a.m.]

3

BY

4

Q Sounds like August/September time frame. Okay.

5

6 During any of your interviews with the FBI, did they identify you as a subject,  
target? Did they let you know what your status was?

7

8

A Not really. And even the warrant they gave me was not the complete  
document.

9

10 But, look, I don't have anything to hide in this. I know what my logic, my  
reasoning, my rationale was. It has everything to do with just making sure that the  
11 country remains intact.

12

13

And it had nothing to do with trying to overthrow a Capitol. I had zero desire to  
do that. So I have no issue cooperating.

14

15

16

Q And has any DOJ attorney told you or indicated to you why you haven't been  
indicted or charges haven't been pressed, just to let you know, I guess? I'm just trying  
to understand why or what the difference is between you and some of the others.

17

18

19

A I'm contrary to the narrative actually. It doesn't help them that I'm not a  
part of -- I've told them here's my logic, here's my rationale, here's what I know we  
should do, here's what I know we shouldn't do, like that. Just I don't fit what they need.

20

21

Q Got it. And without getting into what was said if you did, did you testify  
before the grand jury at all?

22

23

A Huh-uh.

24

Q Okay.

25

A They don't want me.

Q Okay. So the only time that you had materials seized was in the

1 August/September time frame?

2 A Uh-huh.

3 Q And what all was seized from you?

4 A Just my phone.

5 Q Just your phone. Okay.

6 A Which ironically --

7 Q [REDACTED] did you have a --

8 A I was going to say, which ironically actually is more helpful to the defense on  
9 a lot of these people than it is -- do you see what I'm saying?

10 Like, my phone had a lot of other stuff in it, election shit, a lot of stuff that  
11 would've actually kind of explained everybody's logic and reasoning and not fit a narrative  
12 that they're trying to create.

13 Q And just to confirm for the record, make sure it it's clear about the grand  
14 jury, you said, huh-uh, like you have not testified before the grand jury. Is that correct?

15 A I have not participated in any of that.

16 Q Got it. Okay.

17 [REDACTED] I believe that's all I have.

18 [REDACTED] did you have a follow-up?

19 BY [REDACTED]

20 Q Yeah, I just had one quick follow-up for you, Ms. SoRelle.

21 You had mentioned that you knew one member of Representative Jackson's, I  
22 think, campaign staff, Kelly --

23 A Fest.

24 Q And I had -- yeah, Fest -- and I had one other quick.

25 Do you know Kris Morrow or Kristin Morrow? Did they also work on

1 Representative Jackson's campaign?

2 A No, I don't. But what I would like to also add is that Kelly Fest and I share  
3 similar viewpoints on what's happening in the world. Just so I don't see that -- I mean, I  
4 don't know what his involvement is in all of this, but I just don't think that -- I mean, the  
5 disappointment on the certification aspect and having any meaningful challenges was a  
6 viewpoint that Kelly Fest and I shared.

7 Q Okay. And did you ever have any conversations with her  
8 about -- specifically about Representative Jackson's feelings?

9 A No, I did not. But my understanding was that Representative Jackson was  
10 close to Donald Trump.

11 [REDACTED] All right. Great. Thanks very much. I think [REDACTED] has  
12 some questions for you now.

13 [REDACTED] Great. Thanks, [REDACTED]

14 BY [REDACTED]

15 Q Ms. SoRelle, I just wanted to return to the topic of the Great Reset for a  
16 minute. You mentioned it kind of came up in this conversation in the context of after  
17 January 6th. Was it also the case that people were talking about, people were scared of  
18 the Great Reset before January 6th?

19 A That is why Open Texas occurred. That is why all of us went straight into  
20 action.

21 Remember, I told you I was a city attorney at the time. And when I sat with -- or  
22 when the Chamber of Commerce, U.S. Chamber of Commerce, came out and did their  
23 presentation, there was a handful of us sitting in that room going, what is this?

24 Because basically they started telling us that, here's the Texas Triangle, we're  
25 going to start allocating all of our resources here. No resources are going to be going



1       into Lubbock, where I was -- was my hometown. No more -- you know, we're going to  
2       start kind of like clearing out these areas so that we can focus everybody into this area.

3               And we're like, what? Like, what are you doing?

4               And so then a handful of us immediately left there, started researching what the  
5       hell was going on. That's when we come up with, we start looking at U.N. plans and  
6       stuff like that.

7               I'm not saying they're bad. Okay? My point is, is nobody was telling the people  
8       what the plan is, other than the U.S. Chamber of Commerce is out there telling us how  
9       we're going to sell everybody on this idea.

10              And I'm like, okay, what does the control structure look like? Are we changing  
11      things? Can somebody explain this stuff?

12              And the further down you go into WEF and all of those different groups, you start  
13      going, okay, there's a whole nother layer here that we're not really sure what this stuff  
14      entails or what it means to us.

15              And then you also ended up with -- like, I mean, it's in there if you look. Go back  
16      to Event 201, go through all of that stuff. You start seeing this pattern emerge. And  
17      you're looking at this from the standpoint of, are we going to end up with -- and we knew  
18      we were -- vaccine mandates?

19              They wrote all of this stuff out. It's not my fault people don't read, and it's not  
20      my fault that people don't question the media for not telling us the truth.

21              You do have some alternative media -- although they're a little extreme -- you do  
22      have people that are telling you some of the truth.

23              But I also know that if you started paying attention to the vaccines and stuff like  
24      that, everybody already knew those things were not going to be what they expected  
25      them to be, like, it's just -- there were doctors already popping up. There were people

1       that I was communicating with that were kind of already on that same bubble.

2               I had already buried a friend that I had on a ventilator that we tried to get off of  
3       the ventilator and actually had him transferred to a hospital that would've given him  
4       Ivermectin.

5               And regardless of your viewpoint on that, I happen to know, because lots of  
6       Texans used it and a lot of Texans survived, there was a whole alternative protocol.

7               So anyway, all of this to say there was a lot of speculation as to how they were  
8       going to implement this plan that they had through these foreign, secret, squirrel  
9       organizations, the Atlantic Council, WEF, Council of Foreign Relations. I mean, like all of  
10      them had them. Deloitte. I went through Deloitte stuff, which was associated. I  
11      mean, it's all the same thing.

12              And I'm not saying it's bad, okay? What we don't know is what that means and  
13      exactly how it was going to look like or what they were going to do to suppress the  
14      Christians who were not going to be down with the vaccine mandates. That's just a  
15      reality here, especially considering, even though they lie to you and they're slowly rolling  
16      out the information, there is a gene-editing aspect of the mRNA vaccine.

17              They're going to have to admit all of it, and they know that. But some of us were  
18      just a little ahead of the curve, and so the freedom movement was more about making  
19      sure that we did not lose the freedom aspect of our future.

20              It doesn't -- I mean, it may come in the form of a Great Reset, but we didn't want  
21      to be hooked into a prison grid under 5G or whatever. I mean, that's a whole nother  
22      ball of wax, and I don't even know if I agree with all of it.

23              But I do know that the vaccine mandates were coming. There were concerns  
24      with what all of this -- because there's so many different playbooks and things. And  
25      they were using certain phrases that would indicate that those -- something was coming

1 into play.

2 So we don't know if we keep our national sovereignty under this plan. We don't  
3 know any of this stuff. And we know that some of this was coming for sure because of  
4 the plans that were being implemented at the lower levels, like at the county levels.

5 So that's where it started getting into this. Nobody really knows what they're  
6 planning to do to us or what they're going to force us to do.

7 Q Got it. Did you --

8 A And so that's where the paranoia comes from.

9 Q Understood. And that's really helpful. And also I'm sorry to hear about  
10 your friend.

11 Did you hear other Oath Keepers talking about this? Was Stewart Rhodes talking  
12 about this?

13 A That's what everybody was talking about. Everybody knows this. This is  
14 not --

15 Q Well, I guess what I'm getting at is, did January 6th have a particular  
16 significance in the context of the Great Reset? Was there a fear that there would be  
17 something that happened on January 6th related to the Great Reset?

18 A No. This is why I told you last time that we were talking that it is much  
19 easier for me to take on establishment Republicans than it is to take on Democrats,  
20 because Democrats tend to be a little bit more hard core about complying with whatever  
21 they want you to comply with.

22 So it's a lot easier to challenge Greg Abbott or Donald Trump if you're a Christian,  
23 or any of the religious groups who oppose such restrictions, because we know how to  
24 rally around each other and we don't have the issues necessarily that you do when you  
25 start "cross the party line" thing, which is all by design anyway. So there you go.

1           Q    Got it. And last time we spoke, you mentioned -- I think this was in our  
2 informal discussion -- you mentioned the purple and orange coalitions?

3           A    Right. So that --

4           Q    Would you mind explaining that? And is that something that you came up  
5 with or you described, or is that kind of a framework that's out there, people talking  
6 about the orange and purple coalitions?

7           A    So I was unaware of it at the time. I end up talking to war correspondents,  
8 and numerous people actually, that worked with General Flynn in foreign countries.  
9 Some are war correspondents, some are actual staff. And they explained to me how  
10 color revolutions work.

11               And I mistakenly thought that purple was the primary. It is actually orange that  
12 is the primary, and that is the side General Flynn is on.

13               I don't know -- I mean, some speculate that McChrystal's running the left side of  
14 the operation. I'm not really sure.

15               But the reality is, is that General Flynn then spent, like, the last year pretty much  
16 identifying every Christian and whoever in this country -- which maybe he truly is trying to  
17 be helpful, maybe he isn't -- but the whole point is, is that if you look at his own  
18 corporation that he's associated with, they're listed on the WEF.

19               So I don't really know what their goal is, but I do know that they need conflict in  
20 this country.

21           Q    So what's the difference between the purple and orange coalitions?

22           A    So purple, my understanding would probably be the -- I just thought it was,  
23 like, the establishment wing of things, like the -- so controlled opposition. So they're the  
24 ones that are just telling the divisive narrative but not really doing a whole lot to further  
25 the ball down the football field.

1           And then on the flip side of that, you have orange, which is actually progressing an  
2 agenda, which is where you would have seen why you would have had the events at the  
3 Capitol.

4           If you were trying to prevent those of us that were meaningfully wanting to have  
5 challenges -- not prevent challenges from the election but meaningfully wanting  
6 challenges to those five States -- those would have been the ones that would have  
7 implemented some other type of plan to prevent that from occurring.

8           And so I was obviously and will never be associated with the orange side of things.

9           Q     Got it.   And just so I understand, is there a particular group or website  
10 that's talking about the orange and purple coalitions?

11          A     So this is where the war correspondents and all of them come into play.  
12 And then Patrick -- so you had Patrick Bergy, right, and then Tori, or Tore, I don't know  
13 what her name is, Tore Maras or whatever, she's part of all of those factions that I ended  
14 up meeting down the road.

15          And they would explain kind of how that works, that you've got -- because they've  
16 worked the psychological aspects of all of it in the foreign countries as well as -- I mean,  
17 you have -- even Nick Quested, he knows how this stuff plays out, he's part of who taught  
18 me a lot of it down the road.

19          And then you have basically two teams divided out, one moves the football, the  
20 other one sits back.   And I learned about purple from -- and orange actually -- from  
21 Steve Vanderbol, which is who I was staying with when I got back to Texas to work on the  
22 case.   He was explaining color revolutions to me as well.

23          He was a former marine.   And he was explaining that purple is why they all wore  
24 purple to the inauguration and stuff, because they're the controlled opposition, they're  
25 just chillin'.   I didn't realize that the orange was moving in.   But it's a narco-capitalism

1 maybe?

2 And then the establishment side of things would be like the military-industrial  
3 complex aspect of it. But both are working both sides, just for the record.

4 And the goal is basically just to create division and to destroy the legitimacy of the  
5 U.S. Government, which they've done very effectively on the right side, if you think about  
6 it, because they've gone after the FBI so much, which I have no issues with the FBI. I've  
7 worked with the FBI for a lot of years, like when I was down on the border, and DHS and  
8 all of them.

9 So I really didn't have any issues with the organizations, although I do have  
10 concerns with corruption within organizations, but I think that's pretty common.

11 That's why the narratives were, even on the right side, I was really frustrated as  
12 this kind of progressed because I was watching them attack the FBI and stuff like that, and  
13 I was like, okay, you can't delegitimize our government, you can't destroy -- if we're going  
14 to keep a constitutional republic.

15 So this is where Stewart and I are different from them, is that our goal was  
16 actually to retain our constitutional rights, whereas they claim that, but at the same time  
17 they're creating part of the division that we have in this country.

18 And so I start understanding that as time goes by and people start explaining why  
19 we have the narratives that are pushing further and further apart, like outward, and why  
20 we're creating more of a hostile environment within the country.

21 And so once I start understanding all of that, then it starts kind of emerging that  
22 this is exactly how they're doing -- or how the color revolution operates.

23 Q Got it. That's really helpful. Thank you for explaining that.

24 I just wanted to make sure I got some of the names that you mentioned. So you  
25 said Nick Quested, right?

1           A    Yes.

2           Q    The filmmaker?

3           A    Yes.

4           Q    And you mentioned someone named Tore.

5           A    So Tore worked with Brennan and General Flynn and -- well, she worked  
6 during the Obama administration. She worked in Afghanistan. And she's worked in  
7 numerous countries that we flipped. And so she was part of my understanding on how  
8 this stuff works.

9                Now, although she's still working -- she'll say she's not, but she is -- she's still  
10 working to do and achieve the same thing that we're going through. She's got a little  
11 podcast and a show.

12          Q    Do you remember her last name?

13          A    It's Maras. But I think it's like -- she's out of Ohio, but I think her show's,  
14 like, "Tore Says", or something like that. And that was -- she was one that I was -- I  
15 actually ran into Tore and Millie Weaver and -- what's her -- Gavin Wince, and Patrick  
16 Bergy.

17               I got into all of them sort of briefly, because when August of 2020 -- yeah, August  
18 of 2020, there was this show they did on this thing called Shadow -- I think it's called  
19 ShadowGate, and it refers to ShadowNet, and it's how they use AI or IA, internet  
20 activities, to kind of further divide the people, to create these narratives. And it's kind  
21 of how they start pocketing people.

22               Well, anyway, they had done a documentary on it. It gets uploaded. It turns  
23 into this stupid stuff. Gavin and Millie get arrested, which now, I think, was probably  
24 fabricated. But Alex Jones is involved in all this stuff, and this is kind of where Stewart  
25 comes into play, because he kind of gets me in touch with some of these people.

1           And I end up helping Gavin and Millie get out of jail in Ohio. So I think that kind  
2 of brought me into the loop, even though I didn't know them at the time. But later on,  
3 fast-forward, I end up meeting them again.

4           So this is where -- they all know what my position is going into November, and I  
5 don't know what this ends up being at the end.

6           But I realize I get sucked into this earlier on than I thought. And it was really just,  
7 I was on the freedom bubble, and I don't know how much of all of this was coordinated  
8 even with Stewart. I'll just be honest with you, I don't know.

9           Q     Got it.

10          And just for the reporters, Tore Maras is T-o-r-e M-a-r-a-s?

11          A     I believe so.

12          Q     So I wanted to return to -- one of the first sets of questions we talked about  
13 last week were just some organizational-related questions, and there were a couple of  
14 things that I just wanted to tie a knot on.

15          Were there any assets purchased with Oath Keeper funds, to your knowledge?

16          A     Assets as in?

17          Q     Like real property.

18          A     No.

19          Q     Okay. Do you happen to know how much Oath Keepers made off of  
20 merchandise sales?

21          A     I have no clue on the financials to Oath Keepers.

22          Q     Got it. Do you know how Stewart Rhodes was supporting himself day to  
23 day in the year after January 6th?

24          A     I know he was struggling, but I don't know how he was -- I mean, he was -- I  
25 mean, he lived off of pretty much everyone's sofa, so I don't think he was making



1       beaucoup of money. I mean, let's just be real.

2               Q     Got it. I think I heard that he was staying on Alex Jones' sofa for a while.  
3       Do you know if that's true?

4               A     I have no clue who all's sofas he's crashed. He's crashed mine when he  
5       didn't have places to go. He's crashed Chad Rogers' up in Little Elm. And I know he  
6       stayed at Marcia Strickler's some. I know he went to Wyoming and stayed for a while.  
7       I know he's got some friends in Houston that I know he goes and stays with. I mean, I  
8       wasn't his babysitter.

9               Q     Understood. So you don't know if he's stayed with Alex Jones?

10              A     I don't know. I know he was friends with Alex Jones. But I will say highly  
11       unlikely because they started -- so, ironically, this person started emailing me and was  
12       kind of giving me a heads-up on what direction things were going. I have no earthly idea  
13       who they are or where they came from.

14              But a lot of what they were saying was little stuff that were little narratives that I  
15       would watch pop up within the next few days after he would tell me. So I kind of see  
16       him as like a snitch.

17              But he was the one that told me that Alex Jones and all of them, Proud Boys and  
18       Stone and all of them, had decided that Stewart was going to be, like, the fall guy,  
19       basically. And, I mean, and I just watched that play out.

20              And so as it was coming to a head, so to speak, that's when the media started  
21       backing off of Stewart and started attacking him and stuff, and I was like, oh, well, my  
22       little troll friend is super smart.

23              Q     Have you ever been in touch with Alex Jones?

24              A     Yeah. Not without Stewart's association, if that makes sense.

25              Q     Got it.

1           A     So I was on his show right after, but I wasn't invited back because I wasn't  
2 fitting the narrative once again.

3           See, this is where I screwed up. I was not playing their game. And so that's  
4 why, at the end of the day, they've all locked arms and I'm the one that's gone rogue, if  
5 that makes sense, because I know they're full of poopoo.

6           Q     Understood. So when you say they've locked arms, it's Alex Jones. Who  
7 else?

8           A     General Flynn, Roger Stone.

9           Well, so, I don't know that Alex Jones -- my understanding on Alex Jones is that he  
10 was compromised.

11          See, what you guys are going to dig into, if you keep digging, you're going to find  
12 out that all of this comes back to Epstein Island and a lot of sexual shit that they've got  
13 going on. And that's pretty much how they were controlling everybody to accomplish  
14 this goal.

15          And if you really, really are searching for the truth, those are the people that need  
16 to be released, and the people that are holding them hostage need to actually be dealt  
17 with, because pretty much the guy that was embedded in there, that was dating an  
18 Epstein, has the full story of how all of this was accomplished.

19          Q     Got it.

20          What social media networks did the Oath Keepers use to communicate? We've  
21 talked about Signal, the app, a bunch. Were there other apps or networks?

22          A     Telegram. Telegram some. But I added Telegram later on down the road  
23 just because I was watching the audit stuff. And so I got some of them in there, because  
24 I was having a hard time transferring data, because I was watching the bullshit go through  
25 on the audits. And I knew that Sidney Powell and Flynn and all of them were behind it,

1 and I knew that they were manipulating those as well.

2 And so I was trying to get people to understand that we were sitting in the middle  
3 of something. I was just trying to figure out what it was. And as time goes by, I figure  
4 out we're in a color revolution and that it's for the pure -- kind of entraps us, right,  
5 like -- because those of us that are working on the audit stuff or that know what's actually  
6 the issues with all the machines and stuff like that, we're just kind of watching them spin  
7 narratives.

8 So that's what's funny about, like, Marcia Strickler, because Marcia Strickler and I  
9 were working on it from the legal standpoint, and she and I were both coming up to the  
10 same conclusions.

11 We were working on language for our legislature. It didn't go anywhere because  
12 Russ Ramsland intervened. But the fact was is that we knew how they were  
13 manipulating on both sides, the red and the blue.

14 And so we were trying to get those changes implemented into the code, and  
15 instead they totally backfired into something else. And I just consider it the  
16 establishment protecting the establishment.

17 But that's why everybody wants to pin it on Marcia Strickler or Oath Keepers or  
18 any of those people, but the reality is they were the only ones who were actually trying to  
19 do -- with me, and helping me do it -- push something that was actually meaningful as far  
20 as challenges and stuff like that.

21 Q Got it.

22 Did the Oath Keepers ever use a platform called Spreely? Does that ring a bell?

23 A I have no earthly idea. I know they have their Rocket.Chat or whatever. I  
24 don't know. And I think they had a Discord channel at one point.

25 But I know, like, social media they were off of. So I know Stewart was trying out

1 different platforms. I don't know what all they -- I didn't get into any of that, because it  
2 really wasn't my issue.

3 What my issue was, was trying to figure out why they were getting pegged with  
4 the election crap. And my problem with that was that made no sense, considering I  
5 know they were all Trump supporters.

6 And actually, just to be clear, it's not so much Trump as it's freedom-supporting  
7 people. And the only way we had a good shot at that challenge was not necessarily to  
8 overturn it, but to actually get a lawful election. And they knew that too because I had  
9 talked to the organization about that.

10 Q Got it.

11 The reason I asked about Spreely was because in one of the chats that you  
12 provided us somebody mentioned Spreely, and then Stewart said, let's start an account  
13 there. So I wanted to see if that rang a bell.

14 A I don't know that they ever did. But I didn't -- like I said, I wasn't in any of  
15 the real operational aspects of it. I was really just very limited purpose of trying to  
16 figure out what the hell happened on the 6th.

17 Q Got it.

18 Do you have a sense of what news sources were common among the Oath  
19 Keepers? What did Stewart read? What did you read?

20 A I mean, everything. I mean, I started -- as time went by, I started  
21 looking -- like, you actually have really great pieces of the pie on the left side. You have  
22 really great pieces of the pie on the right side.

23 It's kind of a -- but I don't know -- I mean, I know Stewart was close with Alex  
24 Jones. But, I mean, there wasn't anything in particular that I saw that was like -- I mean,  
25 it wasn't all InfoWars, it wasn't Breitbart all the time, it wasn't -- I mean, you've got

1 across-the-board stuff. I don't know. I mean, like, any and everything.

2 Q Sure. Fair enough.

3 I think my colleague, [REDACTED] -- I forgot to announce that he joined. He's an  
4 investigative counsel, and he was with us last week. I think he might have some  
5 additional questions.

6 [REDACTED] Thank you, [REDACTED]

7 BY [REDACTED]

8 Q Hi, again, Ms. SoRelle.

9 So I have a couple of questions to follow up on some of your earlier conversation  
10 with [REDACTED] about the Great Reset fears. I thought that was really interesting and  
11 helpful to understand some of the context.

12 And I know you discussed the Great Reset fears as the reason why Reopen Texas  
13 happened and some of your organizing occurred.

14 I was wondering how the Oath Keepers considered those same fears moving  
15 further into 2020, as you saw some of the events of the summer and activity that was  
16 identified as antifa-related by Oath Keepers. Was that seen as part of the Great Reset,  
17 or was it seen as another thread of problems?

18 A That's all of it.

19 So the way media works, and when you have a plan, and especially like in a color  
20 revolution, they'll start years in advance. My understanding is the original playbook is  
21 hanging out -- and Tore Maras will talk about it, that she was part of some of the planning  
22 for the color revolution during the Obama administration, or that she was at least aware  
23 of the playbook because of her relationship with General Flynn.

24 And [audio malfunction] what's the point, you know, like, what's the end goal?

25 And I mean, she couldn't ever give -- she would just be, like, oh, this is -- oh, I'm unstable.

1 Am I still there on your end?

2 Q Yeah, you're still here.

3 A Okay. So she would say it just has to be this way. And I'm like, okay, I  
4 understand it has to be this way, but can you tell me what this way looks like? I just  
5 want to know what we're moving into. She would never really give me a straight  
6 answer on that.

7 I don't know how full of crap she is. I do know she does have the associations  
8 that she claims she has, because Robert Caron is also associated with her as well. And  
9 like I said before, when I was talking to Robert after the election, I was hearing names of  
10 his associations being, like, Brennan, Clapper, Obama, like, he's been part of all of this for  
11 all along, like the whole time frame.

12 And so I don't know who was setting up who or if it's all just part of a playbook.  
13 But what I know is, the election challenges were garbage because of the Dennis  
14 Montgomery, Mary Fanning stuff. And I watched that kind of play out over the year.

15 But, yes, everybody's concern was what this Great Reset was. The right-side  
16 media has a tendency to tell you certain pieces of the pie. The left side media has a  
17 tendency to tell you the other half of the pie. And between the two is where I figured  
18 out you can part and parcel pretty much any of the media and try to get some  
19 extrapolation or extrapolate exactly what their plan or agenda is.

20 I'm still not a hundred percent certain, but that's where all the fears were  
21 stemming from.

22 Q And so were the Oath Keepers commonly discussing these fears in advance  
23 of activities organizing over the summer as well?

24 A Yeah. I mean, that started as soon as the virus started. I think Stewart  
25 had -- everybody gave it maybe 4, 6 weeks maybe, and then realized all the pieces.

1       Everybody started doing their independent research, start actually looking for documents  
2       online, not just listening to media narratives, and started going from there.

3               Q     Right.   And as Oath Keepers organized in places, in response to violence in  
4       places like Portland, which we talked about last week I believe, how was that seen as  
5       connected to the Great Reset?   If you could just help me understand the narratives  
6       there.

7               A     Destabilization.

8               Q     Okay.

9               A     Destabilization, which is where, if you want to go with if Stewart is an asset,  
10       maybe.   But, see, this is where you have Project Gladio, which was basically where they  
11       identified terrorist threats across the globe.

12              Well, so the FBI and all of them would've been implementing the same, similar  
13       type stuff here, which would've made the patriots be labeled as terrorists.

14              Although what they didn't realize is, because of the Great Reset aspect of it, it's  
15       actually a setup for the FBI, and the FBI doesn't get that.   They probably do now.  
16       These are conversations I've had with the FBI.

17              So just so you know, I've been very, very helpful to our government in trying to get  
18       them to understand how these dynamics are going to destroy them if they're not careful.

19              Q     Got it.   And we talked a lot last week about election fraud and what exactly  
20       happened during the 2020 election.   Were those events also seen as tied to this fear of a  
21       Great Reset?

22              A     Wait.   Repeat that.

23              Q     Were the allegations of fraud in the 2020 election that we talked about a lot  
24       last week, was that also seen as part of this greater threat of a Great Reset?

25              A     No.   So this is why I was saying my case that I filed -- that I ultimately

1 filed -- was against the 50 States for rebellion. And I allege treason in there for a reason:  
2 Because it's giving foreign aid, comfort to foreign territories, which kind of goes into that  
3 whole theory that if you're working with global groups to try to overthrow a government.

4 For me, all of this came down to legal compliance. So our election was not  
5 lawful. And the only way our country stays intact is if we get our politicians and our  
6 political parties and our leadership back into the fold of compliance with the law, because  
7 right now we've got rogue elements doing a lot of stuff that they shouldn't be doing,  
8 spending money, the CARES Act.

9 I mean, look at the massive wealth transfer. I mean, look at what they're doing  
10 to this country to completely disintegrate it.

11 And you can look at how they're attacking groups. You can see how they're  
12 using the DOJ to demonize the conservatives, and they're creating this tension and this  
13 friction with all these agencies and these groups. It's by design. This is specifically  
14 what this is for.

15 So, yes. No, my concern was not so much the fraud as, if we're going to keep a  
16 constitutional republic, we have to have legal compliance and compliance with the  
17 Constitution, because Article I and Article II of the U.S. Constitution both dictate how the  
18 States are going to comply with the law.

19 Then you have HAVA, which they've signed onto, and they have to comply with  
20 that financially, the law aspect of it.

21 And so all of the changes, everything that was done, was not done across the  
22 board. There were a lot of rogue agents. I mean, that's all someone else. But the  
23 whole point --

24 Q No. Thank you for clarifying.

25 A -- is basically --



1           Q    Thank you for clarifying.   No, thank you.

2           So I have one more question on this point, and then I had a couple other questions  
3 to return to earlier points of our conversation.

4           The last question on this point was, you said from the earliest days of the  
5 lockdown there were county-level officials who were acting to further the agenda of the  
6 Great Reset, as you framed it.

7           A    Correct.

8           Q    Who did you identify as these county-level officials, and what were their  
9 motivations for doing this?

10          A    So you have to look at Vanguard and BlackRock.   You have communities in  
11 the DFW area specifically that are being hit by that.

12          So when you did the massive wealth transfer and you put everybody on  
13 forbearance, and then you had the PPP loans and all of that garbage, when you play that  
14 game, what you did was end up effectively pulling -- you start screwing with people's  
15 mortgages and stuff like that.   You have communities that are being built in the DFW  
16 area completely by BlackRock or Vanguard at this point.

17          So everybody in the conservative movement, or in the patriot movement as I'll call  
18 it -- I mean, it doesn't really even matter if you're conservative, you could be a liberal  
19 because we've those crossed over now too -- which I welcome, by the way.   A lot of  
20 people are starting to realize we have to transcend basically the political ideologies in this  
21 country if we're going to survive.

22          So basically what you have is a lot of people starting to keep tabs on their  
23 communities because we're watching these corporations come in and buy up large  
24 properties or build large complexes in our communities, and we're watching them all  
25 being built in the same area that you saw in the Texas Triangle.

1           We're all aware of what's going on. We're all aware of what this agenda or plan  
2 is. And so we're just trying to babysit it and monitor it and make sure that our freedoms  
3 aren't lost in the process.

4           Q   Understood. One somewhat specific question.

5           Fast-forwarding in time a little bit to October -- or rather September 2020 -- do  
6 you remember when President Trump said, "Stand back and stand by," which was  
7 directed at the Proud Boys during the first debate?

8           A   I know that exists. I saw it later.

9           Q   Okay.

10          A   But, look, everybody wants to -- it is not --

11          Q   If I could ask --

12          A   I'm not like a massive Trump fan. I mean, I don't -- a Presidency doesn't  
13 really bother me. It's what the agendas are.

14          Q   Sure. Understood. Do you remember if other Oath Keepers discussed  
15 that comment or had a particular reaction to it?

16          A   Yeah. Probably more discussed than anything else at that point. They  
17 were not affiliated at all. I mean, I've seen the text messages where Kelly Meggs -- I saw  
18 those yesterday -- where Kelly Meggs is -- or where -- I'm sorry -- Enrique says that  
19 they've formed some kind of alliance. And that was -- or maybe it was Kelly Meggs  
20 referring to some kind of conversation or something like that. I saw that online.

21          And as far as Stewart knew, there was no merger of their groups or --

22          Q   That's helpful to know. Thank you. Just wanted to ask.

23          I have one more category of questions. And if you are not aware of some of the  
24 details here, please just feel free to say so. And that's about the Oath Keepers'  
25 relationship with local law enforcement, which we touched on during our first session but

1 wanted to return to ask some follow-ups.

2 So it's true, to your understanding, that the Oath Keepers tried to recruit former  
3 law enforcement and military?

4 A That is the mission of the organization. But, yes, former law  
5 enforcement -- actually, active law enforcement works with them. Like I said, they  
6 worked hurricane relief in Katrina guarding warehouses and facilities for law  
7 enforcement.

8 Like, this is such a sick joke, actually, because they're respectful of law  
9 enforcement -- I wouldn't say necessarily recruiting of law enforcement -- they're  
10 respectful of the law of the land and making sure that things are smooth and there's not  
11 any issues when disasters occur or when things -- events occur.

12 I know they communicate with law enforcement anytime they go into an area, just  
13 to let them know they're there, what they're there for, to make sure there's no issues.  
14 Yeah.

15 Q That's really helpful.

16 How did that relationship usually take shape? Was there a designated point of  
17 contact between Oath Keepers chapters and law enforcement, or was it more of an open  
18 line of communication?

19 A You just start calling. If you're going into an area, you just call your local PD  
20 or your sheriff's department, you let them know you're coming in and why you're coming  
21 in.

22 Q And in terms of joint operations, was that more of a case-by-case basis -- you  
23 mentioned disaster relief -- or was there sometimes longer-standing agreements about  
24 Oath Keepers assisting?

25 A No, it's not anything twisted or weird. Just like you have the Cajun Navy or

1 any of those groups that go into any areas that need help, the same basic premise. You  
2 just let them know we're coming in to help. "What do you need?" right, "What do you  
3 need?" and they go in and start assisting with whatever law enforcement directs them to  
4 do.

5 They're just an organization that is known to have people in their organization  
6 that are capable of doing things the right way, the lawful way, and aid law enforcement  
7 or a community -- local officials even -- in making sure that the community remains stable  
8 during an event.

9 Q That's very helpful context.

10 Was there ever any indication of training exercises that Oath Keepers would  
11 provide to local law enforcement or vice versa?

12 A I mean, I'm not going to say that they didn't work together. I mean, if you  
13 do have a cop or somebody that's in there, it's not a training exercise. But I'm just  
14 saying, you could have a couple of law enforcement agents or an FBI agent and a military  
15 member, I don't know, at something training.

16 But they would do -- so contrary to the narrative too, that the defense aspect of  
17 things, anybody who's a gun owner damn well ought to be out there training and  
18 shooting their guns occasionally to make sure that they're firing properly and that they're  
19 trained.

20 I mean, that's one of the fake narratives sort of about, "Oh, they've got guns, oh,  
21 they're out doing shit." Well, yeah, I hope they are.

22 And especially if you're concerned with destabilization of local communities  
23 coming into the Great Reset, one of the things you would want is being able to  
24 practice -- and I hope to God they are practicing urban-type drills where you're not going  
25 to hit innocent people in the event that it is a hostile situation and you are defending a

1 local community.

2 And that's what I think the government doesn't want. But the fact is, that's what  
3 the militia is. And that's kind of what the Constitution refers to the militia as being, is  
4 that you have groups in your local communities that are able to defend and protect the  
5 people in that community from hostile whatever.

6 So I can't -- I mean, it would be more dangerous -- this is where narratives are  
7 stupid -- it would be more dangerous for these guys not to practice and then still own  
8 guns than it would be for them to at least be trained in what they're doing.

9 Q Understood. You mentioned that there were sometimes FBI agents that  
10 might've been involved in some of these exercises as Oath -- was that as Oath Keepers?  
11 Was there any indication that FBI agents were involved in the Oath Keepers or --

12 A So chances are Stewart is an asset of the FBI. This is another reason why  
13 they're delegitimizing and picking on Stewart.

14 So when you realize that our government went to private contracting everything,  
15 then you'll understand that you even have private contractors for FBI, you have private  
16 contractors for just about any agency at this point.

17 So there are contractors that are associated with all of these organizations. 1AP.  
18 I don't know so much about Proud Boys, but, I mean, I can assume. And then also with  
19 Oath Keepers.

20 Q Thank you.

21 Did you ever have any interaction with the CSPOA, Constitutional Sheriffs and  
22 Peace Officers Association?

23 A I don't know if my internet is stable.

24 Okay. So as for them, that's Sheriff Mack. That goes to -- also associated with  
25 that was Robert David Steele. Those are all part of the Great Reset, "moving the ball

1 forward" people.

2 So, no, we would not have had any association with them because they are  
3 actually adverse in our position.

4 Q Can you explain why that was?

5 A So if you look into going back to all of the private military-industrial complex  
6 contractors, you'll find out that you have Robert David Steele and Stratfor, and you've got  
7 Roger Stone with a Jewish group -- not that I have any issues with any  
8 religions -- Psy-Group, Joel Zamel.

9 So these were all mechanisms that they were using to further the agenda for the  
10 global groups. And so that's why the right side, Stewart was not part of that, and that's  
11 why he was not in their fan club basically. And I don't know that he knew that, but I  
12 know that's probably ultimately why they targeted him.

13 But Robert David Steele did the ReAwaken Tour, prior to passing, with Sheriff  
14 Richard Mack and a bunch of other people. And that tour actually Stewart and I went  
15 and snuck into an event, because I wanted to see what my -- what the bad guys look like.

16 And so what I was assessing at that point was that basically they were giving  
17 people a bunch of bullshit without telling them how to solve the problem, which is why I  
18 knew that you had to go back to your States and start working through your States -- not  
19 overthrowing your States in a violent manner, but using your State "powers to the  
20 people" provision.

21 But they were not giving them those skill sets at all. They were just enflaming  
22 them or inciting them.

23 Q So I know that Sheriff Richard Mack had been on the board of the Oath  
24 Keepers previously, but by the time of the events we're discussing here you're saying that  
25 the break had been more or less total? You guys were not on the same side of these

1 issues?

2 A No, not at all.

3 So the reality is, is that Stewart -- I would say that a way to describe it would be  
4 that those guys went military-industrial complex route and Stewart stayed with  
5 government route.

6 Q Okay. Thank you.

7 And you mentioned before -- I might've missed some of this -- but you said, quote,  
8 "a Jewish group." What did you mean by that?

9 A That's Psy-Group. That is the same thing as what General Hayden has in  
10 ClearForce. That's how the narratives are created for affecting elections. Or you had  
11 Cambridge Analytica. You had all of those. Those are all just ways that are influence  
12 to execute the color revolution here in the United States.

13 And so Roger Stone is associated with Joel Zamel and Psy-Group, and that is how  
14 they were running their narratives coming into the 6th.

15 Q And did you and other Oath Keepers view the Psy-Group operation as an  
16 important part of the Great Reset efforts, or that was just a general comment?

17 A This is stuff I had to put together after the fact.

18 So after the 6th, just like I was researching the Great Reset before the 6th -- long  
19 before the 6th -- after the 6th, when I was trying to figure out what the eff just happened,  
20 because it was contrary to what we wanted, we wanted a meaningful challenge to the  
21 election through the congressional process, through the lawful proceeding, and we  
22 couldn't quite figure out why it was going rogue.

23 And so then that's when I started meeting with all the different assets that are  
24 involved in color revolutions. And that's when I started learning all the tool kits. And  
25 that's when I started learning who the different players were, who their associations

1        were, and how they were executing the plan of the color revolution here in the United  
2        States.

3                Q     Thank you.    Helpful context.

4                [REDACTED]    Well, I think that's all the questions that I have right now.    And I  
5        want to thank you for being so generous with your time and sitting down with us twice  
6        for this deposition.    And I know you've spoken with us in prior months too.    So I know  
7        this has been helpful for us.

8                And I wanted to pause before we go off the record to see if any of my colleagues  
9        on the call have any other questions.

10              [REDACTED]    I just wanted to echo [REDACTED]'s comments and say thank you,  
11        Ms. SoRelle.    You've been really generous with your time and your thoughts, and it's  
12        been extremely helpful.

13              The Witness.    You're welcome.

14              [REDACTED]    Same.    Thanks very much.

15              [REDACTED]    All right.    Thank you.

16              So, Ms. SoRelle, thank you again for your time today and for your time last week.

17              Right now the deposition will stand in recess subject to the call of the chair.    We  
18        can go off the record.

19              [Whereupon, at 12:32 p.m., the deposition was adjourned, subject to the call of  
20        the chair.]



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Certificate of Deponent/Interviewee

I have read the foregoing \_\_\_\_ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

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Witness Name

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Date